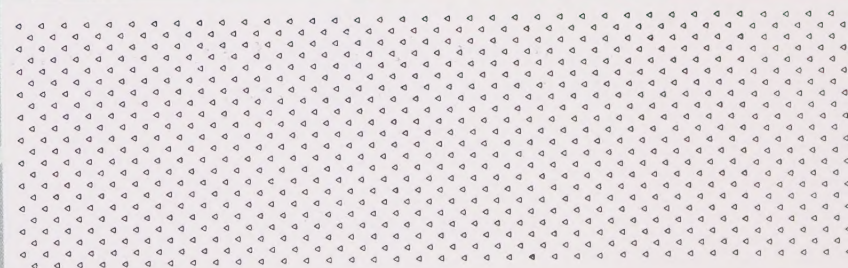
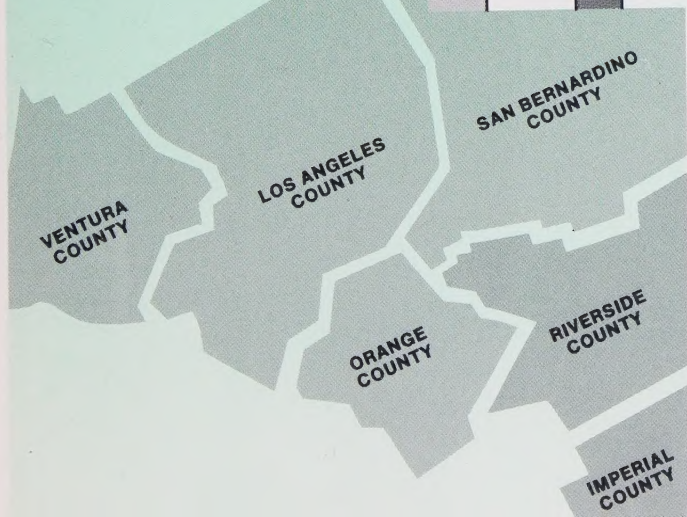
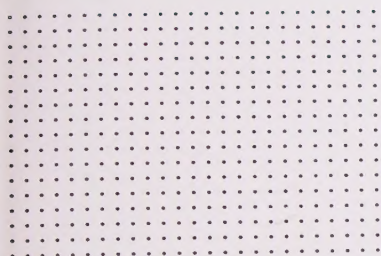
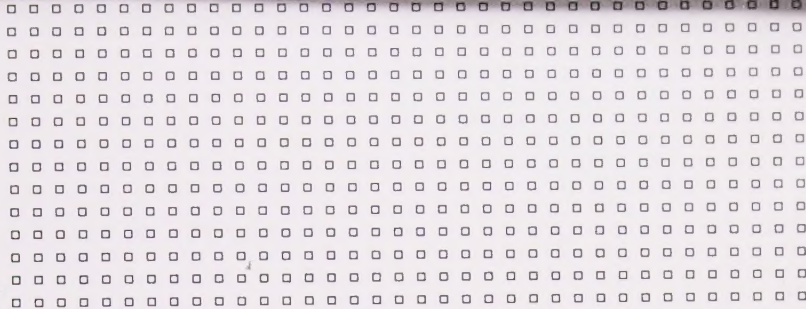


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DECEMBER 1988

# REGIONAL HOUSING NEEDS ASSESSMENT



*The Regional Housing Needs Assessment was prepared and funded pursuant to California State Housing Law.*



# **REVISED REGIONAL HOUSING NEEDS ASSESSMENT**

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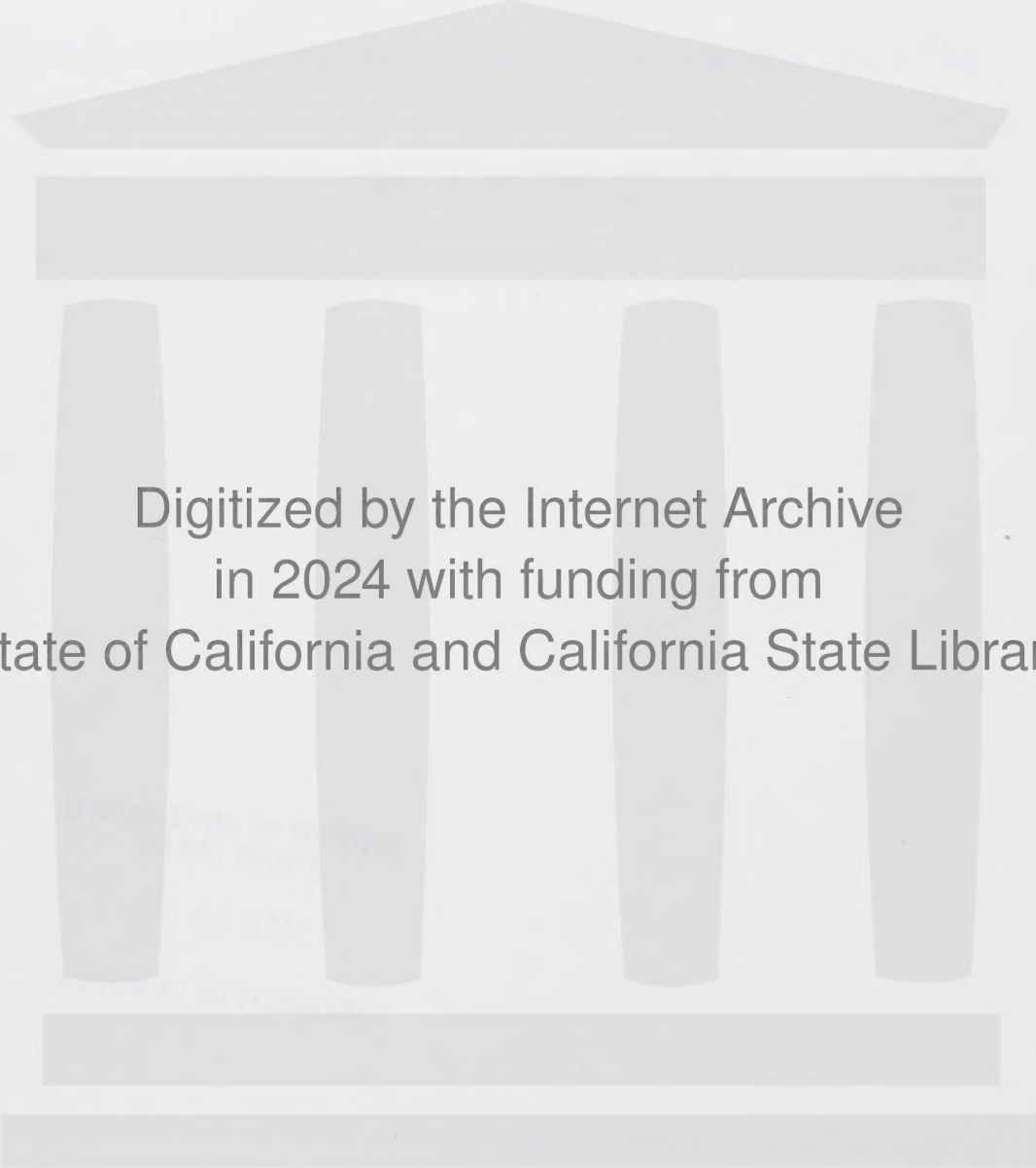
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i.

## FOREWORD





# 1988 REGIONAL HOUSING NEEDS ASSESSMENT

## FOREWORD

The SCAG Region (Ventura, Los Angeles, San Bernardino, Riverside, Orange and Imperial counties) is one of the most rapidly growing areas in the United States -- over 13 million people live here now and an additional five million will come into the Region by the year 2010, raising the area population to over 18 million.

Planning for such growth is the chief objective of the Southern California Association of Governments (SCAG). Consequently, the agency periodically develops a regional Growth Management Plan (GMP). The most recent GMP forecasts growth for the region to the year 2010 and identifies the areas where new jobs and new development are expected to occur.

Three other major plans developed by SCAG are the Regional Housing Needs Assessment (RHNA) Regional Mobility Plan (RMP) and the Air Quality Management Plan (AQMP). Because housing, mobility and air quality are directly affected by growth patterns, these plans are related to the GMP. And, because each of these has some affect on the others, the four plans -- the GMP, the RHNA, the RMP, and the AQMP -- are linked to each other. One result to be noted, is that a regional policy implemented in one of the plans may influence the distribution of growth in all the other plans.

For example, the GMP clearly states that improved job/housing balance (a small shift of new jobs to housing-rich areas and of new housing to job-rich areas) would help to avert further congestion. In doing so, it would also help to improve air quality in the region.

Based on the GMP, the RHNA is the tool which local jurisdictions use to determine their housing needs. Accordingly, it ensures that there is enough housing to accommodate the people expected to be in the region.

California Housing Law requires that SCAG identify Existing and Future Housing Needs every five years. The most recent (1988) RHNA identifies each jurisdiction's Existing Housing Need (as of January 1, 1988) and Future Housing Need to July 1, 1994. It should be noted that by state law, SCAG cannot consider certain types of growth control measures when developing the RHNA. In addition, a State Attorney General's opinion has indicated that certain types of zoning and other land use restrictions may not be considered.

The methodology used in the RHNA involved the resolution of many technical and policy questions. A housing allocation Subcommittee of the CEHD guided this process over several months and with a great deal of discussion of alternative approaches. In general, the methodology used in the previous Regional Housing Allocation Model (RHAM) was continued, but new circumstances compelled new approaches in several areas. The basis for much of the data, the 1980 census, was now eight years old rather than three years old. This fact resulted for instance, in a new approach to vacancy need determination. The new legal questions presented by changes in the law and the recent State Attorney General's Opinion resulted in new decisions on the question of the extent to which RHNA could consider local growth management, zoning and other land use practices. Finally, we learned from the last round and decided to make the application of income level distribution formulae adjustments uniform among all jurisdictions in the region.

The RHNA was approved by the SCAG Executive Committee on June 30, 1988. Each city and county (unincorporated area) then faced the choice of either using the numbers presented in it to identify its individual housing needs, or provide justification based on their circumstances for modifying such numbers. Those needs are then reflected in the Revised Housing Element of each jurisdiction's General Plan and provided to the State Department of Housing and Community Development (HCD) by July 1, 1989.

During the 90 days following the June 30 adoption, 48 local jurisdictions did request revisions. This Revised RHNA incorporates the changes made to the RHNA after a 60 day review of those requests.

In addition to the official revisions incorporated here, there are also advisory allocations for each jurisdiction. These advisory allocations lack official status due to the complexities of the State Housing Law, but do reflect methodological changes made after June 30 in an effort to further improve assessment of needs. Jurisdictions are urged to use these advisory allocations and SCAG will support their use.

# I.

## EXECUTIVE SUMMARY





## I. EXECUTIVE SUMMARY

The 1988 Regional Housing Needs Assessment (RHNA) is one of four plans issued by SCAG, which together create a management system for dealing with growth in the region. The Growth Management Plan (GMP) is the overall framework for defining the future of the region. It identifies the degree of growth expected and the patterns of land use, job development, and population that will result by 2010. The RHNA, using the GMP as a basis, determines the housing need that local jurisdictions will plan for in the Housing Elements of their General Plans. Current housing need and future housing need to July 1, 1994 are included in the RHNA.

The other two plans - the Regional Mobility Plan and the Air Quality Management Plan - deal with the problems of transportation and air quality within this same GMP context. The Mobility Plan bases its recommendations for transportation policy upon the forecast presented in the GMP, while the GMP is reflective of transportation concerns in its incorporation of Job/Housing Balance policy. Job/Housing Balance policy in the GMP is translated into adjustments to the population and job location forecasts that reduce future commuting needs by making it possible for more people to live closer to their jobs. This not only assists in reaching a goal of avoiding further traffic congestion, but also results in advancing air quality goals. Finally, the AQMP contains transportation control measures that are incorporated in the Mobility Plan.

This interdependence of the four plans forwards the goals contained in each of them. The RHNA makes possible meaningful local planning for the provision of housing adequate to meet regional housing needs. In so doing, it also acts as an implementing tool of the GMP. It brings the GMP forecasts a large step closer to reality, thereby bringing Job/Housing Balance, clean air, and better transportation that much closer as well.

The RHNA is presented with this interdependence of plans in mind. It is not merely a plan required by law, but an integral part of a comprehensive approach to growth management in this region.

The State Housing Law requires SCAG to identify both Existing and Future Housing Needs every 5 years. The 1988 Regional Housing Needs Assessment identifies each jurisdiction's Existing Housing Need, as of January 1, 1988, and Future Housing Need for the July 1, 1989 to July 1, 1994 period. SCAG is doing this in compliance with the mandate of the State Housing

Law. Each city and each county (unincorporated area) will then use these regional need numbers, identified for it in the RHNA, as a basis for the identification of housing needs in the 1989 Housing Element of its General Plan.

### **Existing Need:**

Existing Need in the 1988 RHNA is defined as the number of lower income households paying more than 30% of their income for housing. This is the same definition used in the 1983 RHAM. The data base in the 1988 RHNA is also the same - the 1980 Census.

### **Future Need:**

Future Need in the 1988 Assessment is also dealt with in a way similar to the 1983 RHAM. It is defined as the number of units that would have to be added in each jurisdiction to accommodate the forecasted growth in the number of households by July 1, 1994, as well as the number of units that would have to be added to compensate for anticipated demolitions and changes to achieve an "ideal" vacancy rate.

Advisory Allocations, contained in Appendix F, modify this definition somewhat, by allowing ten years to attain ideal vacancy rates. While these allocations do not have the official status of those in Chapter IV, they represent a more realistic goal in many cases.

### **Income Levels:**

The Future Need additional units are then further broken down by the income levels of the households that they would be supplied for. The four household income categories used are defined by state law. They are "very low" (less than 50% of median), "low" (50% to 80% of median), "middle" (80% to 120% of median), and "upper" (more than 120% of median).

The state housing law requires that in allocating this percentage distribution by income level for each city, further "impaction", or concentration of lower income households, be avoided. This means that the percentage distribution of very low and low income households accommodated by additional units should be less than the existing percentage of such lower income households in jurisdictions that already exceed the regional average percentage of such households. These jurisdictions with higher than average concentrations of lower income households are called "impacted" jurisdictions.

The State Housing Element Law calls for each jurisdiction to continue to house the total number of households in each income group which it has on the beginning date of the plan, plus the households, by income group allocated to it as Future Needs.

One purpose of the Future Needs Allocations by income group is to relieve lower income impaction. This will not occur unless local governments continue to provide housing opportunities for their existing lower income households as well as the additional opportunities called for in the Future Need Allocations.

### **Method and Policy Decisions**

The Method and Policy decisions and assumptions used in the RHNA were arrived at by the Regional Housing Needs Assessment Subcommittee of the Community Economic and Human Development (CEHD) Committee. A complete record of those decisions is contained in the minutes of the meetings of the Subcommittee as well as in the actions of the CEHD and Executive Committee on issues that were forwarded to them. The RHNA Subcommittee met monthly since April, 1987.

#### **Impaction:**

The 1988 RHNA deals with the "avoidance of impaction" issue by allocating reduced percentages of lower income and increased percentages of middle and upper income units to impacted jurisdictions, while doing the reverse for non-impacted jurisdictions. All jurisdictions are given Future Need lower income percentages 25% closer to the regional average percentage than the percentage now existing in each jurisdiction. (For example, if 40% of households in the region were lower income and 50% of the households in impacted jurisdiction "X" were lower income, the Future Need additional units would be 47.5% lower income. Likewise, a non-impacted jurisdiction "Y" with 30% of its households now lower income, would be allocated a 32.5% lower income proportion for its additional units.)

In addition to this "25% avoidance of impaction" adjustment, the RHNA makes an additional adjustment for substantially impacted jurisdictions—those which exceed the regional average of lower income households by more than 10% in 1994, even after the "25%" adjustment. For these jurisdictions, the proportion of lower income future units is further reduced to a level, which if maintained for twenty years, would result in no jurisdiction exceeding the regional average by more than 10%, unless such an adjustment would mean its Future Need lower income proportion would be less than two-thirds of its current proportion.



## **Growth Management:**

The state housing law, in addition to the requirements mentioned above, also requires the RHNA to meet several criteria in arriving at total Future Need for each jurisdiction. Many of these criteria are met in the course of SCAG's work on forecasting future population, housing, and household totals. Five years ago, the basis of the Regional Housing Allocation Model was the SCAG-82 Development Guide. This time, SCAG had no recently adopted forecast until after the RHNA was adopted. In addition, the state requirements had become more explicit in terms of the extent to which the RHNA might or might not take into account local "growth control", zoning, and other practices.

In response to these new circumstances, it was decided that the RHNA would use the latest available growth figures consistent with the special constraints it faced. These special constraints were imposed by state law with regard to "growth control", and by a recent State Attorney General's Opinion with regard to zoning and other local practices. The Growth Management Plan (GMP) faced no such constraints. In addition, the RHNA had to take into account two criteria which the GMP work also did, but which the Baseline work which preceded it did not: commuting patterns and access to employment. The GMP policy on job/housing balance essentially fulfills both criteria. Thus, the RHNA is based upon the Draft GMP adjusted for constraints under state law.

## **Legal Issues:**

The State Housing Law is plain in stating that the RHNA may not take into account in arriving at its estimate of a city's 1994 total number of households, any local measure which limits the number of housing units. From the Attorney General's Opinion, it was likewise decided that any adjustment made to Baseline in the GMP forecast work based on zoning only, would have to be reversed to be consistent with state law. The RHNA actually used estimates from the GMP of forecasted 1994 total households by jurisdiction. These forecasts were arrived at in the GMP work by evaluating past growth in each area and forecasted growth to 2010.

## **Use of RHNA Allocations in Local Housing Elements:**

The final issue for cities will be the purpose to which their RHNA numbers are to be put. In the past, there has been a great deal of miscommunication and misunderstanding of the true significance of these numbers. They are NOT quotas for development which cities must reach by 1994. Rather, they are an identification of regional housing need and an allocation of it by



jurisdiction. Each jurisdiction's allocation is to be used by it in the Housing Element of its General Plan. Ordinances and measures pursuant to the objectives of the General Plan must then be consistent with it. When a jurisdiction finds in its Housing Element that the allocation is not achievable by 1994 for certain reasons explicit in the State Housing Law, it may modify these numbers in accordance with state law. On the other hand, those jurisdictions that found their allocations not supported by other factors, availed themselves of the Appeals Process conducted by SCAG after July 1, 1988. Most such appeals were based not on the jurisdiction's ability to meet numerical goals, but rather upon some objective flaw in the allocation itself.

### **Revised and Advisory Allocations:**

This Revised RHNA contains two sets of allocations--Revised and Advisory. On December 15, 1988 the SCAG Executive Committee brought the RHNA process to a successful conclusion by approving the remaining revisions to the RHNA adopted by it on June 30, 1988. The result is the Revised set of allocations.

Foremost among the revisions were those approved in response to requests from cities received as part of the appeals process established in the State Housing Law. Forty-six cities and two counties, acting as local jurisdictions for their unincorporated areas, availed themselves of this opportunity to have their RHNA allocations reviewed by SCAG in light of special local circumstances that they brought to SCAG's attention.

The RHNA Subcommittee, which was established in 1987 to work on the policy and method decisions that went into the RHNA, acted as a reviewing committee. Their recommendations were then forwarded to the Community, Economic and Human Development (CEHD) Committee. The CEHD, in turn, made their recommendations to the Executive Committee for final action.

Also approved were some important Advisories, which will be included in Appendix F. These Advisories cannot be binding on the jurisdictions due to the complexities of the State Housing Law, but result in assessments of need for each of them that are even more realistic than those contained in the "official" RHNA allocations. Rather than wait another five years to improve our estimates, staff felt that such improvements could be made now. These advisory numbers can therefore be used by those jurisdictions wishing to use them in their upcoming Housing Elements and SCAG will support such choices during the State HCD review.

The major Advisory affecting the 130 jurisdictions that did not request revisions to their RHNA allocations, reduces by 50% that part of the vacancy adjustment attributable to existing vacancy deficiencies, by recognizing that ten rather than five years is a more realistic period during which this existing problem can be corrected. Those 48 jurisdictions that did appeal received this adjustment as part of their revision.

## II.

### INTRODUCTION AND OVERVIEW





## **II. INTRODUCTION AND OVERVIEW**

The State Housing Element Law requires SCAG to identify regional housing need every five years. The 1988 Regional Housing Needs Assessment (RHNA) fulfills this requirement for 1988. The 1983 Regional Housing Allocation Model (RHAM) fulfilled the requirement in 1983.

### **Identification of Housing Need:**

This identified need has two components: Existing Need and Future Need. Both Existing Need and Future Need are identified on a regional level, and then allocated to the cities and county unincorporated areas according to certain criteria prescribed in the law, as well as pursuant to policy decisions made by the Council of Governments mandated to identify regional housing need.

Existing Need, in both the 1988 RHNA and the 1983 RHAM was defined by SCAG in terms of overpayment by lower income households in each jurisdiction. Those households with less than 80% of the county median income paying more than 30% of their income for housing were deemed to be overpaying. This information was obtained from 1980 Census data for each city and applied directly to current household totals.

Future Need identification involves a more complex set of criteria, factors and policy decisions. First of all, the state housing element law requires taking the following six criteria into account when determining the distribution of regional housing needs to jurisdictions:

1. Market Demand for Housing
2. Employment Opportunities
3. Availability of Suitable Sites and Public Facilities
4. Commuting Patterns
5. Type and Tenure of Housing Need
6. Housing needs of Farmworkers

In addition, the distribution must seek to avoid further "impaction" of jurisdictions with relatively high proportions of lower income households.

### **Meeting the Criteria for Identifying Need:**

SCAG's Growth Management Plan (GMP) work takes these six criteria into account in arriving at its forecast of future household and housing unit totals for each area. There are certain factors that the GMP may consider in arriving

at these forecast levels that the RHNA may not. The state housing law is explicit in barring the RHNA from considering certain kinds of "growth control" measures. In addition, an Attorney General's Opinion issued recently advises against considering zoning and other local practices without looking beyond them to the six criteria above. In other words, "growth control", zoning, and other local practices, which the GMP forecast may take into account, may not be considered by the RHNA unless there are reasons to do so independently of the measures themselves and consistently with state law. The reason for this becomes apparent when one considers the use to which local jurisdictions will put the RHNA identified needs numbers. Before discussing this in more detail, however, it is first necessary to complete our description of the RHNA and its purpose.

The GMP forecast served as the basis for identifying the Future Need in each locality and as means by which SCAG takes the six criteria above into account. Market Demand for Housing was taken into account in the GMP, which, based on the economic and demographic forces analyzed in the Baseline studies, determined the levels of future population, housing unit, household, and job growth by location.

Employment Opportunities and Commuting Patterns found their realization in the Job/Housing Balance policy incorporated in the GMP forecast levels. This analysis was part of an interactive process carried out between those at SCAG responsible for growth forecasting and the Transportation Planning Program, which analyzed the Baseline results in terms of resultant traffic levels and congestion. Policy options were then identified by the GMP staff aimed at dealing with the resultant congestion and mitigating its effects by channeling growth into more efficient patterns that minimized home to work travel. This adjustment, in turn, led to both the GMP forecast and to the basis for Air Quality Management Plan (AQMP) planning, by minimizing sources of on-road mobile pollution through less congestion. Availability of Suitable Sites and Public Facilities were taken into account in the GMP work through the disaggregation of total regional growth to subregions and ultimately to cities.

Type and Tenure of Housing Need was analyzed as part of the GMP effort by observing recent building type mixes and separately determining tenure through an analysis of the future age structure of heads of household in the region and the propensity at each age group to either own or rent. Both results - building type and tenure preference - were then matched and analyzed in light of the current building type stock and how it is held (tenure). The GMP effort then turned to the task of disaggregation by matching past local growth trends with unit mix and land availability data in order to arrive at local future forecast levels. Finally, the estimation of

Farmworker Needs results from the economic forecasts for agricultural jobs, which are part of the overall job forecasts done for the GMP.

This, then, is how the RHNA, the GMP, the Regional Mobility Plan, and the AQMP are linked together in their inception. They are also linked together in their purposes and in terms of being different parts of the same vision of the future.

### **Linkage among the GMP, RHNA, AQMP, and Mobility Plan**

The GMP is the overall framework for defining the future of the region. It essentially paints a picture of that future by identifying land use patterns, population levels, housing and household growth, and job development locations. The Regional Mobility Plan then identifies how mobility is to be maintained, congestion mitigated, and air quality enhanced in this future region through the policies and actions it contains. The AQMP develops and, in turn, incorporates the transportation control measures in the Mobility Plan aimed at reducing emissions from motor vehicles. Finally, the RHNA determines the housing growth that local jurisdictions will plan for in the Housing Elements of their General Plans.

While the Regional Mobility Plan will lead to an implementation of transportation and air quality policies and measures through the transportation planning processes established at the state and national levels, the RHNA will lead to an implementation of residential development patterns consistent with the needs it identifies through the local General Plans. How this works is dealt with in greater detail below. Generally, the needs identified in the RHNA, as modified by local jurisdictions in ways permitted by the state Housing Law, will find their way into the Housing Elements of the local General Plans. Local zoning, subdivision, and other regulation will conform to local General Plans, thereby implementing the RHNA and, indirectly, the housing component of the GMP.

### **Identifying Need:**

Existing Need, as noted above, identifies the number of lower income households in each jurisdiction that are currently overpaying for housing. Future Need identifies the number of housing units that will have to be added to each jurisdiction's housing stock from July 1, 1989 to June 30, 1994, in order to accommodate household growth during that period, compensate for any demolitions carried out, and achieve a 1994 vacancy rate that will allow the market to operate efficiently.

In addition, the additional units called for in Future Need must be broken



down by the income level of the households they are meant to house. There are four household income level categories defined in state law. They are "Very Low" (less than 50% of the median), "Low" (50%-80% of the median), "Middle" (80%-120% of the median), and "Upper" (more than 120% of median). Future Need is identified for all four of these income groups. In economic terms, Future Need therefore identifies both effective and latent demand for housing in each jurisdiction. Identification of Future Need for the higher income levels gives each jurisdiction an estimate of effective demand, or how much demand for housing there will be in their locality as a function of market forces. Future Need at lower income levels is often largely latent demand, since such income levels, without subsidy or other assistance, are often ineffective in causing housing to be supplied.

The starting point for determining the income level distribution of Future Need within each jurisdiction is each jurisdiction's current household income distribution. For both the RHNA and the RHAM before it, the 1980 Census was the source of data used for determining this. If the existing income distribution in each locality were allowed to determine its Future Need income distribution, no change would ever occur. Such a determination would run counter to the requirement in state law to seek to avoid "impaction" in jurisdictions with higher than average concentrations of lower income (i.e., Very Low and Low income) households. The way in which and the extent to which SCAG seeks to avoid "impaction" in the RHNA is a policy rather than technical decision. In order to make such decisions and deal with the interaction between policy and technical/legal requirements, a RHNA Subcommittee to the Community Economic and Human Development (CEHD) Committee was established.

### **Method and Policy Decisions:**

The Subcommittee, after extensive discussion of impaction avoidance methods used in the 1983 RHAM and various other alternative approaches, decided that the RHNA would follow a course similar to that used in the 1983 RHAM, but different in that its approach to impacted jurisdictions would be more uniform. In 1983, the RHAM first adjusted each jurisdiction's percentage of Future Need lower income units in a way that would bring the percentage of such future additional units 25% closer to the regional average. The regional average percentage of lower income households was, and still is, 40.2%. If a locality was below this proportion, its percentage of Future Need units was increased 25% of the way toward 40.2%. If it was above this proportion, it was decreased 25% of the way. (For example, a "non-impacted" locality with 30% lower income households currently would have a Future Need that was 32.5% lower income, while an "impacted" locality with 50% lower income households currently would have a Future Need that was 47.5% lower income).



After making this “25% of the way” adjustment in 1983, the Review Process revealed that most jurisdictions were satisfied with it, except for some that were both “impacted” and slow growing. The adjustment would not get some of them to levels near the regional average for all households (existing and future) for centuries, and more was called for. The proportion of lower income households in these few localities was then further adjusted in a way that would result in their income mix of households being identical to the regional average within 100 years. This “100 Year” adjustment was possible because it was not applied to all impacted localities and it involved no further adjustments to other communities.

The Subcommittee knew it faced these same issues in the 1988 RHNA and determined to reach an impact avoidance policy decision that was both fair and uniform in its application. It decided to first make the same “25% of the way” adjustment made in the 1983 RHAM. It then decided to make a further adjustment for highly impacted jurisdictions - those that were more than 10% above the regional proportion of lower income households. This adjustment guarantees that there will be many fewer such highly impacted jurisdictions in 20 years. The number of years to reach this goal was determined by subtracting lower income Future Need from the highly impacted jurisdictions at a rate that would still allow the RHNA to meet overall regional goal totals established by the state.

Other policy decisions involved the conditions under and the extent to which the RHNA would have to diverge from its GMP base in order to comply with the more stringent legal requirements relating to growth control, zoning, and other local practices. Here it was decided that the RHNA would indeed be based on the GMP, since the GMP made compliance with the six criteria in the Housing Law possible. Any differences with the GMP resulting from the GMP properly taking into account factors that the RHNA could not, would be dealt with by “reversing” such considerations from GMP levels to the extent that they made a difference.

There were also other policy and method decisions made by the Subcommittee on a variety of issues. For instance, the demolition adjustment method was to be based on the assumption that the average number of units demolished per year between 1989 and 1994 would be the same as the three year average in the 1984-86 period for each jurisdiction. Vacancy adjustments were to be based upon the goal of achieving a 2% vacancy rate for single unit structures and a 5% rate for multi unit structures by mid-1994. In localities where the vacancy adjustment would have been negative and the State DOF estimated 10% or more of the housing stock was unoccupied, existing vacancy need was set at zero. These jurisdictions are designated with the letter “V” in Tables 29 through 34. It was assumed that they were vacation home locations. These adjustments add considerably to the hous-

ing need attributable to growth. This is due to the large stock of housing already in place and the very low current vacancy rates, respectively. These and other decisions are discussed more fully in the following chapters.

In November, 1988, the RHNA Subcommittee reconsidered the length of time communities should have to address existing vacant unit need, and recommended the following change which was, in turn, approved by the CEHD Committee and the Executive Committee: A 10 year rather than a 5 year basis for achieving the ideal existing housing vacant unit need in cases where a community has less than the ideal number of vacant units. This allows a 50% reduction in this component of housing need. The future vacant unit need associated with growth was not be affected.

The RHNA Subcommittee felt that asking communities to build additional units to house expected households with an ideal vacancy rate, while also requiring communities to go back to the existing housing stock and, in those cases where the vacancy rate is lower than the ideal, demand that at vacancy rate be corrected in five years, was burdensome. This is particularly true in the "built out" urban area where the housing market has been "tight" for 10 years or more and existing vacant unit need is, in a number of cases, higher than anticipated household growth. Also, in densely developed cities with a high proportion of multifamily units (predominantly "affordable" housing), current policy forces them to become even more densely developed and "impacted" with low cost units if for no other reason than to meet ideal vacancy levels.

The change is intended to establish a more realistic timeframe for meeting the ideal vacancy goal for the existing housing stock and to equalize extra vacancy goals between single and multifamily type localities. It is applied to the Revised allocations of all jurisdictions submitting a local revision request, while it appears in the Advisory allocations of all other communities.

### **Use of RHNA Allocations by Local Governments:**

As was mentioned above, each local jurisdiction will use the Needs identified in the RHNA in the Housing Element of its General Plan. In some cases, the locality will choose to use the quantities identified directly and without modification. In other cases, a locality may choose to avail itself of the options it has under the state Housing Law, and use the RHNA quantities as a "starting point" for its Housing Element work. This latter course can be followed if the city can demonstrate to the State Housing and Community Development Department (HCD), which reviews all Housing Elements, that, for certain permissible reasons, such quantities are not reasonably attainable by mid-1994 in that jurisdiction. These reasons include the inability of a city to be able to reach such goals.

Once the locality has identified its housing need, either by using the RHNA quantities directly or by modifying them, the other elements of the General Plan, and the local ordinances implementing it will logically follow. This final step brings us to the issue of “circularity”, which underlies the legal issues that have been presented in the RHNA process.

### **Legal Issues:**

While the foregoing has already dealt with several legal issues, one major concern remains to be explained. That is the issue of “circularity” alluded to in the Attorney General’s Opinion and obvious to all those who have dealt with RHNA issues. Quite simply, if the regional growth forecast were to take only local zoning and other measures into account without looking beyond them to the six criteria and to other objective factors, it would merely reflect such local zoning and other measures. The RHNA, without looking beyond them would also, in turn, merely reflect them in its Future Need identification to local jurisdictions. The localities would then be starting with a regional housing need number that did nothing more than ratify its existing zoning and other practices. Finally, the new ordinances implementing such a General Plan would not change existing ordinances in order to accommodate actual need, but merely to accommodate the need that the existing ordinances and practices were meant to meet. In other words, nothing would change in response to changing needs, because the entire process would be a closed loop.

It was in order to avoid such “circularity”, the RHNA was held to more stringent standards. The RHNA therefore does look at growth control and other local measures, as is explained in the discussion above on meeting the criteria for identifying need, in order to be consistent with these legal requirements.

### **The RHNA Appeals and Review Process:**

Appendix A outlines the Appeals Process for Jurisdictions and the grounds for Appeal. The State Housing Law provides for a 90 day Appeals Period and 60-day Review Period. Local Jurisdictions had the opportunity to appeal their RHNA needs identifications to SCAG during a 90 day period beginning on July 1, 1988. The grounds for such appeals should not be confused with those grounds upon which a locality may modify its numbers with HCD approval. Rather, these grounds for appeal deal mainly with either errors by SCAG, distribution of regional shares to the local level, or other problems not related to the city’s ability to fulfill any particular need through its own resources.



Issues brought to SCAG during the 90 day Appeals Period beginning July 1, 1988 could have also included mistakes of fact made in the RHNA or errors in the distribution of regional shares of growth. For instance, a non-vacation home jurisdiction designated in Tables 29 through 34 as a vacation home area successfully sought to have their existing vacancy need adjusted from "0" to a negative value.

**Revisions Made in Response to Appeals and Review:**

Forty-six cities and two counties, acting as local jurisdictions for their unincorporated areas, requested revisions. Appendix E summarizes the actions taken by SCAG in response. The results are embodied in the Revised allocations in this Revised RHNA.



### III.

EXISTING NEED



### III. EXISTING NEED

The Regional Housing Needs Assessment identifies Existing Need in each jurisdiction in terms of overpayment by lower income households. Overpayment is defined as rent or house payments that exceed 30% of income. Lower income households are those within each jurisdiction that have incomes of less than 80% of the county's median household income.

The RHNA also identifies additional units needed to raise current vacancy rates in each jurisdiction to levels at which the market would operate more freely. Because its current need affects the need for future housing development, it is included in Chapter IV, "Future Need", rather than here.

Not every household that pays a disproportionately high amount of their income toward rent or a house payment is considered in need of housing assistance. A household is defined as in need of assistance only if it meets the following income and payment criteria:

1. Has an annual income of 80% or less of the median income for the standard metropolitan statistical area (usually, the county), and
2. Pays an inordinate share of that income (currently defined as greater than 30%) toward a house payment or rent.

Households that earn 80% or less of the median income for an area are termed "lower income". Among the four income classes identified in the RHNA, they constitute the very low income (less than 50% of median) and low income (50-80% of median) categories. The households within these two categories that pay more than 30% of their income toward a shelter payment are the households that have an "existing" need for affordable shelter. This type of existing housing need is broken down by tenure type (owners and renters).

The definition of existing need is not all inclusive. It does not count lower income households who do not pay an inordinate amount of their income for shelter, but live in substandard housing, nor does it include households who are homeless or live in overcrowded conditions. Existing household need is narrowly defined to include only lower income households who pay the defined inordinate amount of income toward a house payment or rent.

The definition of lower income household and inordinate share of income (more than 30%) is the same as that used by the Federal Department of

Housing and Urban Development (HUD). This allows for consistency between the State Housing Element existing household needs assessment and the Federal Housing Assistance Plan -- Existing Household Needs Assessment for renter households.

The income information used here in identifying Existing Need is based on 1980 census information. No update of this information was available. Thus, the proportion of households in the very low and low income categories is assumed to have not changed since 1980. What has changed is the number of households in each category.

For instance, while the proportion of very low and low income households in each jurisdiction is assumed to be the same in 1988 as in 1980, the number of households in the category was scaled up based on the amount of household growth that occurred in this time period. Consequently, if a locality experienced a 10% increase in all households, it was assumed that each of the income categories increased by 10%. The proportion of lower income households that paid an inordinate share of income for shelter in 1988 was assumed to have stayed the same as it was in 1980.

The 1988 number of very low and low income households in need may be adjusted downward by the number of additional households assisted by government subsidy programs since 1980 which reduce shelter payments to no more than 30% of household income (e.g. lower income households assisted by Section 8 housing assistance payments or Public Housing subsidies). This adjustment would be made by local governments, outside the RHNA adoption process, when the local housing element is developed.

On the other hand, the number of very low and low income households in need could be adjusted upward to account for the impact of homeless persons on the jurisdiction (households in need that are not living in an occupied unit). This adjustment would also be made outside of the RHNA adoption process. As provided in the new state law (AB 1996), the homeless needs assessment could be performed as part of the required "identification of adequate sites for emergency shelters," required in local housing elements.

### **Vacancy**

The existing need for vacant units is defined as the additional units needed to achieve an ideal vacancy rate of 2% in single-family units and 5% in multifamily units in 1988. The existing need for vacant units increases future housing needs in localities where the rate is below the ideal level ("deficit"



in vacant units) and lowers future housing unit needs in communities that have a vacancy rate above the ideal level ("surplus" in vacant units), except in jurisdictions whose vacancy rate, as reported by DOF, exceeds 10%. Vacancy rate information was obtained from the latest Federal Home Loan Bank Housing Vacancy Survey (1987).

Because the existing need for vacant units affects the level of needed housing development in the future, this component of existing need is part of the future housing need assessment.

TABLE 1: REGIONAL HOUSING NEEDS ASSESSMENT: EXISTING NEED

LOS ANGELES COUNTY - LOWER INCOME HOUSEHOLDS PAYING MORE THAN 30% OF INCOME FOR SHELTER (OVERPAYMENT)

JURISDICTION	1988	LIHHs OVERPAYING FOR SHELTER			OWNERS			LIHH OVERPAYMENT BY TENURE AND INCOME			RENTERS LOW
	HOUSEHOLDS	LIHHs	TOTAL	VERY LOW	LOW	TOTAL	VERY LOW	OWNERS LOW	RENTERS TOTAL	RENTERS VERY LOW	
AGOURA HILLS	6,039	839	546	230	316	342	139	203	203	91	113
ALHAMBRA	27,841	12,111	6,003	3,920	2,084	821	551	270	5,182	3,368	1,813
ARCADIA	18,556	5,066	2,642	1,604	1,038	428	277	151	2,213	1,328	885
ARTESIA	4,417	1,603	755	526	228	244	189	55	511	337	173
AVALON	1,082	532	286	191	96	20	12	8	265	179	87
AZUSA	12,374	5,296	2,419	1,577	842	377	250	127	2,042	1,327	715
BALDWIN PARK	16,236	6,852	3,501	2,321	1,180	1,221	756	465	2,280	1,565	715
BELL	8,755	4,745	2,379	1,738	641	181	138	43	2,198	1,600	598
BELLFLOWER	23,151	9,770	5,167	3,353	1,816	687	472	214	4,480	2,879	1,601
BELL GARDENS	9,210	5,452	3,078	2,254	824	320	199	122	2,758	2,055	703
BEVERLY HILL	15,360	4,762	2,760	1,714	1,046	288	183	105	2,471	1,531	940
BRADBURY	296	55	0	0	0	0	0	0	0	0	0
BURBANK	38,558	14,652	7,549	4,814	2,735	1,417	916	502	6,132	3,899	2,233
CARSON	23,831	5,886	2,713	1,648	1,065	1,266	710	556	1,447	938	509
CERRITOS	15,233	1,493	884	452	432	600	296	304	284	156	128
CLAREMONT	10,775	2,640	1,311	799	511	345	191	155	964	609	356
COMMERCE	3,172	1,450	586	446	140	126	92	34	460	354	106
COMPTON	23,195	12,131	6,473	4,930	1,544	2,080	1,459	621	4,394	3,470	924
COVINA	15,710	5,216	2,620	1,692	929	668	414	253	1,951	1,276	675
CUDHAY	5,357	3,343	1,809	1,298	509	112	83	29	1,696	1,215	481
CULVER CITY	16,556	4,702	2,208	1,287	921	349	221	128	1,859	1,067	792
DOWNEY	33,472	11,146	5,893	3,790	2,102	1,264	839	425	4,627	2,951	1,676
DUARTE	6,646	2,359	1,041	708	333	413	265	148	629	444	185
EL MONTE	26,408	13,494	7,366	5,160	2,206	1,093	704	389	6,274	4,457	1,817
EL SEGUNDO	6,795	1,753	854	538	316	100	50	50	754	487	267
GARDENA	18,200	6,625	3,208	2,058	1,151	468	286	182	2,742	1,772	970
GLENDALE	64,312	26,432	14,042	8,985	5,056	1,622	1,065	557	12,419	7,920	4,499
GLENDORA	15,789	4,010	2,156	1,380	777	786	500	286	1,370	880	490
HAWIIAN GARD	3,343	1,591	828	590	239	155	108	47	673	481	192
HAWTHORNE	26,713	10,632	5,652	3,496	2,156	453	283	169	5,198	3,213	1,985
HERMOSA BH	9,578	2,663	1,265	740	525	159	110	49	1,105	629	476
HIDDEN HILLS	510	48	31	22	9	28	19	9	3	3	0
HUNTINGTON P	14,477	8,788	4,471	3,432	1,038	286	199	88	4,184	3,234	951
INDUSTRY	84	31	19	12	8	2	1	2	17	11	6
INGLEWOOD	37,045	17,559	9,946	6,470	3,478	1,195	732	463	8,751	5,737	3,014
IRWINDALE	238	92	32	25	7	5	5	0	26	19	7
LA CANADA FL	6,853	843	362	198	165	268	153	115	95	45	50
LA HABRA HTS	1,624	221	83	46	37	75	40	35	8	5	2
LAKEWOOD	26,340	6,322	2,985	1,869	1,117	1,248	815	433	1,737	1,053	684
LA MIRADA	12,447	2,216	1,236	773	462	619	373	246	616	401	215
LANCASTER	28,036	9,448	3,807	2,517	1,292	1,189	760	429	2,620	1,757	863
LA PUENTE	8,740	3,243	1,620	1,105	515	544	314	230	1,077	792	285
LA VERNE	9,890	2,937	1,042	641	400	245	140	105	796	500	296
LAWNDALE	9,020	3,599	2,023	1,311	712	268	193	75	1,754	1,118	637
LOMITA	8,144	3,282	1,461	926	535	180	106	74	1,281	819	461

TABLE 1: REGIONAL HOUSING NEEDS ASSESSMENT: EXISTING NEED

## LOS ANGELES COUNTY - CONTINUED

JURISDICTION	1988 HOUSEHOLDS	LIHHs	LIHHs OVERPAYING FOR SHELTER			OWNERS TOTAL	LIHH OVERPAYMENT BY TENURE AND INCOME				
			TOTAL	VERY LOW	LOW		OWNERS VERY LOW	OWNERS LOW	RENTERS TOTAL	RENTERS VERY LOW	RENTERS LOW
LONG BEACH	163,432	76,323	39,422	26,355	13,067	4,296	2,690	1,606	35,127	23,666	11,461
LOS ANGELES	1,222,354	559,838	293,016	198,470	94,547	38,403	24,705	13,698	254,614	173,765	80,849
LYNWOOD	14,097	6,654	3,557	2,639	918	804	502	302	2,752	2,137	615
MANHATTAN BH	14,383	2,603	1,314	770	544	381	250	131	933	520	413
MAYWOOD	6,533	3,482	1,757	1,289	467	216	119	97	1,540	1,171	370
MONROVIA	12,822	5,680	2,716	1,823	893	412	282	130	2,304	1,541	763
MONTEBELLO	18,268	7,216	3,729	2,474	1,255	691	426	264	3,039	2,049	991
MONTEREY PK	19,227	6,479	3,238	2,030	1,208	682	408	274	2,556	1,622	934
NORWALK	25,827	8,575	4,271	2,620	1,650	1,366	809	557	2,904	1,812	1,092
PALMDALE	14,443	5,503	2,422	1,637	784	664	419	245	1,758	1,219	540
PALOS VERDES	5,000	350	158	79	80	93	52	41	65	26	39
PARAMONT	12,351	5,842	2,810	1,878	932	402	242	160	2,408	1,636	772
PASADENA	49,115	21,758	11,221	7,428	3,792	1,723	1,070	653	9,499	6,360	3,140
PICO RIVERA	15,641	5,678	2,684	1,763	920	1,098	728	370	2,585	1,035	550
POMONA	35,836	16,664	8,685	5,889	2,796	2,224	1,382	843	6,461	4,508	1,954
RANCHO PV	15,002	1,335	684	348	336	352	187	165	331	161	170
REDONDO BH	27,383	7,832	4,252	2,345	1,907	591	343	248	3,660	2,002	1,658
ROLLING HILL	646	46	0	0	0	0	0	0	0	0	0
ROLLING H.E.	2,657	189	98	58	41	76	47	29	23	11	11
ROSEMEAD	13,684	6,158	2,940	2,009	931	698	461	237	2,243	1,549	695
SAN DIMAS	10,230	2,322	912	562	350	356	221	135	556	342	214
SAN FERNANDO	5,671	2,427	1,155	804	351	318	209	109	837	595	242
SAN GABRIEL	11,941	4,908	2,292	1,496	797	498	339	158	1,795	1,156	638
SAN MARINO	4,415	366	161	93	68	147	81	65	13	11	2
STA CLARITA	34,697	8,466	4,372	3,087	1,285	2,047	1,770	278	2,325	1,318	1,006
SANTA FE SP	4,432	1,591	803	545	258	251	150	101	552	395	158
SANTA MONICA	45,741	19,531	11,187	7,035	4,152	482	333	149	10,705	6,703	4,002
SIERRA MADRE	4,679	1,450	673	449	223	124	85	39	549	364	185
SIGNAL HILL	3,376	1,445	723	462	260	67	42	25	657	420	237
SO EL MONTE	4,676	2,301	1,033	746	287	230	136	94	803	610	193
SOUTH GATE	22,871	10,978	4,947	3,485	1,462	966	646	321	3,982	2,840	1,142
SO PASADENA	10,259	3,632	1,801	1,079	721	247	153	94	1,555	927	628
TEMPLE CITY	11,210	3,565	1,544	980	564	501	330	171	1,043	649	394
TORRANCE	52,023	13,058	6,873	4,150	2,723	1,273	812	461	5,601	3,339	2,263
VERNON	26	6	0	0	0	0	0	0	0	0	0
WALNUT	6,443	741	546	284	263	362	183	179	187	101	86
WEST COVINA	29,711	6,566	3,799	2,235	1,564	1,243	743	500	2,557	1,493	1,064
W HOLLYWOOD	22,561	11,484	4,296	3,253	1,043	79	46	34	4,216	3,207	1,009
WESTLAKE VIL	2,476	349	146	61	86	93	44	49	54	17	37
WHITTIER	27,118	9,464	4,861	3,128	1,732	1,004	648	357	3,857	2,481	1,375
UNINCORP	289,318	100,658	50,317	33,492	16,826	13,774	8,313	5,458	36,543	25,177	11,367
TOTAL COUNTY	2,962,983	1,201,441	618,527	412,915	205,615	103,790	66,012	37,778	514,740	346,906	167,833

TABLE 2: REGIONAL HOUSING NEEDS ASSESSMENT - EXISTING NEED

ORANGE COUNTY - LOWER INCOME HOUSEHOLDS PAYING MORE THAN 30% OF INCOME FOR SHELTER (OVERPAYMENT)

JURISDICTION	TOTAL HOUSEHOLDS	LIHHS	LIHHS OVERPAYING FOR SHELTER			OWNERS TOTAL	LIHHS OVERPAYMENT BY TENURE AND INCOME		RENTERS TOTAL	RENTERS VERY LOW	RENTERS LOW
			TOTAL	VERY LOW	LOW		OWNERS VERY LOW	OWNERS LOW			
ANAHEIM	88,003	39,249	17,529	10,659	6,870	2,420	1,339	1,081	15,108	9,320	5,788
BREA	12,003	3,625	1,507	789	718	386	195	191	1,120	593	527
BUENA PARK	22,749	8,417	4,017	2,504	1,513	949	623	325	3,069	1,881	1,188
COSTA MESA	36,909	17,273	7,938	4,625	3,311	1,018	586	432	6,920	4,040	2,880
CYPRESS	13,718	3,498	1,539	920	618	414	247	167	1,125	674	452
FOUNTAIN VALLEY	17,315	3,740	1,371	649	722	626	310	315	745	339	407
FULLERTON	40,591	16,318	7,520	4,689	2,831	1,085	669	416	6,438	4,022	2,416
GARDEN GROVE	45,113	18,135	8,014	4,816	3,197	1,875	1,070	806	6,137	3,747	2,391
HUNTINGTON BCH	68,395	23,733	10,565	5,960	4,604	1,927	1,137	790	8,638	4,824	3,814
IRVINE	36,398	7,316	2,601	1,293	1,308	769	379	391	1,832	914	918
LAGUNA BEACH	11,329	4,928	2,218	1,334	886	368	217	151	1,851	1,116	735
LA HABRA	17,911	7,469	2,917	1,760	1,157	506	287	219	2,412	1,473	939
LA PALMA	4,821	911	528	266	263	179	104	75	348	161	187
LOS ALAMITOS	4,286	1,680	646	393	252	108	72	36	538	321	218
NEWPORT BEACH	31,415	10,147	4,431	2,625	1,806	858	553	305	3,573	2,072	1,501
ORANGE	36,197	14,262	6,016	3,493	2,524	1,313	817	495	4,704	2,676	2,029
PLACENTIA	12,976	3,672	1,402	805	595	411	194	218	992	613	379
SAN CLEMENTE	15,874	7,524	3,197	1,907	1,290	440	285	155	2,755	1,621	1,135
SAN JUAN CAPISTRANO	8,611	2,988	793	400	393	280	157	123	514	243	271
SANTA ANA	70,255	34,495	15,230	9,924	5,305	2,518	1,559	959	12,711	8,364	4,347
SEAL BEACH	13,985	7,832	1,195	736	459	294	191	104	901	546	355
STANTON	10,275	5,364	2,211	1,305	906	279	177	102	1,931	1,128	803
TUSTIN	18,194	8,278	3,507	1,838	1,669	316	177	139	3,190	1,661	1,529
VILLA PARK	1,867	133	95	48	47	88	42	46	7	6	1
WESTMINSTER	25,117	9,143	3,770	2,296	1,474	880	534	346	2,890	1,762	1,129
YORBA LINDA	14,436	2,728	1,062	522	540	448	225	223	615	297	318
UNINCORP. AREA	123,246	38,946	12,640	7,033	5,607	4,243	2,415	1,828	8,398	4,619	3,780
TOTAL COUNTY	801,989	301,804	124,460	73,591	50,867	24,997	14,559	10,438	99,465	59,030	40,434
NEW CITY (1988)											
MISSION VIEJO	17,148	3,154	1,987	1,534	452	752	746	7	1,234	789	446
REV. UNINCORP. AREA	106,098	35,791	10,654	5,499	5,154	3,491	1,669	1,821	7,164	3,830	3,334



TABLE 3: REGIONAL HOUSING NEEDS ASSESSMENT: EXISTING NEED

RIVERSIDE COUNTY - LOWER INCOME HOUSEHOLDS PAYING MORE THAN 30% OF INCOME FOR SHELTER (OVERPAYMENT)

JURISDICTION	1988	LIHHs	LIHHs OVERPAYING FOR SHELTER			TOT-OWNER	LIHH OVERPAYMENT BY TENURE AND INCOME			TOT-RENTER	INCOME	
	HOUSEHOLDS		TOTAL	VERY LOW	LOW		VL-OWNER	LOW-OWNER	VL-RENTER		LOW-RENTER	
BANNING	6,634	3,596	1,554	1,003	551	492	269	223	1,063	734	328	
BEAUMONT	3,056	1,785	559	322	237	121	63	58	438	259	179	
BLYTH	2,540	1,140	532	337	196	161	92	69	371	244	127	
CATHEDRAL CITY	9,457	4,303	1,749	889	860	501	188	314	1,250	703	547	
COACHELLA	3,130	1,499	639	417	223	221	143	77	418	272	146	
CORONA	16,654	4,980	2,540	1,512	1,029	741	390	351	1,800	1,122	678	
DESERT HOT SPRINGS	4,195	2,249	1,013	643	371	380	224	156	632	417	214	
HEMET	15,693	9,573	2,902	1,551	1,350	863	406	457	2,038	1,146	892	
INDIAN WELLS	1,056	171	67	26	41	62	26	36	7	2	5	
INDIO	10,365	4,436	2,035	1,364	671	486	266	221	1,550	1,100	451	
LAKE ELSINORE	4,705	3,190	1,301	882	419	291	155	136	1,009	727	282	
LA QUINTA	3,102	915	587	224	361	233	111	122	354	113	241	
MORENO VALLEY	27,878	NA	4,268	2,810	1,458	2,207	1,159	1,048	2,061	1,651	410	
NORCO	5,651	1,277	556	293	263	332	171	161	224	121	102	
PALM DESERT	7,843	2,518	1,144	447	697	380	147	233	762	301	462	
PALM SPRINGS	14,365	6,033	2,534	1,233	1,300	524	221	303	2,010	1,012	998	
PERRIS	4,150	2,324	825	483	342	254	143	111	569	338	231	
RANCHO MIRAGE	3,895	1,243	374	142	232	160	50	110	214	92	122	
RIVERSIDE	71,920	26,179	13,489	7,292	6,197	3,199	1,636	1,563	10,291	5,656	4,635	
SAN JACINTO	5,221	3,315	1,373	869	502	370	187	183	1,001	682	319	
UNINCORP. AREA	114,191	48,189	11,295	6,087	5,208	4,051	2,385	1,666	7,243	3,702	3,541	
COUNTY TOTAL	335,701	128,914	51,334	28,822	22,507	16,028	8,431	7,597	35,305	20,394	14,911	

TABLE 4: REGIONAL HOUSING NEEDS ASSESSMENT - EXISTING NEED

SAN BERNARDINO COUNTY - LOWER INCOME HOUSEHOLDS PAYING MORE THAN 30% OF INCOME FOR SHELTER (OVERPAYMENT)

JURISDICTION	1988	LIHHS	LIHHS OVERPAYING FOR SHELTER			TOT-OWNERS	LIHH OVERPAYMENT BY TENURE AND INCOME				
	HOUSEHOLDS		TOTAL	VERY LOW	LOW		VL-OWNERS	LOW-OWNERS	TOT-RENTERS	VL-RENTERS	LOW-RENTERS
ADELANTO	1,978	1,359	735	433	302	124	41	83	611	392	219
BARSTOW	7,530	2,831	1,164	742	422	337	185	151	827	556	271
BIG BEAR LAKE	2,370	1,168	553	343	208	176	102	75	375	241	134
CHINO	14,376	3,393	1,717	970	747	566	267	300	1,150	702	447
COLTON	11,956	5,906	2,062	1,319	743	467	255	212	1,595	1,062	533
FONTANA	23,183	8,972	4,014	2,549	1,465	1,486	851	634	2,528	1,697	831
GRAND TERRACE	3,545	798	257	129	128	91	47	45	164	81	83
LOMA LINDA	5,061	2,444	1,102	641	460	128	62	66	974	580	394
MONTCLAIR	8,233	2,989	1,574	844	730	384	215	169	1,191	630	561
NEEDLES	1,989	879	259	180	79	55	45	10	203	134	69
ONTARIO	39,479	14,015	6,523	3,643	2,880	1,664	904	759	4,860	2,739	2,121
RANCHO CUCAMONGA	29,844	5,879	3,069	1,380	1,689	1,723	736	986	1,346	643	703
REDLANDS	20,870	7,513	3,218	1,960	1,258	804	493	311	2,414	1,467	947
RIALTO	19,665	6,411	2,774	1,517	1,259	1,126	585	541	1,648	930	718
SAN BERNARDINO	54,473	27,345	11,775	6,942	4,834	2,782	1,602	1,180	8,993	5,340	3,653
UPLAND	22,783	6,767	3,308	1,824	1,484	631	332	298	2,679	1,493	1,186
VICTORVILLE	10,118	4,735	2,064	1,062	1,001	464	184	279	1,598	878	720
UNINCORP. AREA	150,348	68,559	24,573	13,847	10,726	10,229	5,625	4,604	14,344	8,222	6,122
COUNTY TOTAL	427,801	171,963	70,741	40,324	30,416	23,236	12,532	10,704	47,501	27,789	19,712
NEW CITIES (1988)											
HESPERIA	8,225	4,409	2,115	1,349	765	1,242	741	501	871	608	263
HIGHLAND	7,753	3,977	2,194	1,434	760	806	387	418	1,388	1,047	341
29 PALMS	3,853	2,557	1,291	859	432	389	181	208	902	678	224
TOTAL	19,831	10,944	5,600	3,642	1,958	2,437	1,309	1,127	3,161	2,333	828
REV. UNINCORP. AREA	130,517	57,614	18,973	10,205	8,769	7,793	4,316	3,477	11,183	5,889	5,294

TABLE 5: REGIONAL HOUSING NEEDS ASSESSMENT: EXISTING NEED

VENTURA COUNTY - LOWER INCOME HOUSEHOLDS PAYING MORE THAN 30% OF INCOME FOR SHELTER (OVERPAYMENT)

JURISDICTION	1988 HOUSEHOLDS	LIHHS	LIHHS OVERPAYING FOR SHELTER			OWNERS TOTAL	LIHH OVERPAYMENT BY TENURE AND INCOME CATAGORY			RENTERS VERY LOW	RENTERS LOW
			TOTAL	VERY LOW	LOW		OWNERS VERY LOW	OWNERS LOW	RENTERS TOTAL		
CAMARILLO	17,318	5,524	1,807	1,100	708	568	317	251	1,240	783	457
FILLMORE	3,341	1,721	500	336	164	129	75	54	372	261	110
MOORPARK	6,688	2,220	960	600	360	360	186	174	600	414	186
OJAI	2,900	1,398	572	366	206	168	102	66	403	263	140
OXNARD	38,134	18,266	7,649	5,007	2,643	1,472	934	538	6,176	4,073	2,103
PORT HUENEME	6,754	3,519	1,116	686	430	169	111	58	947	575	372
SAN BUENAVENTURA	35,093	15,757	6,522	4,193	2,330	1,136	693	443	5,387	3,500	1,888
SANTA PAULA	7,717	4,136	1,375	1,025	349	297	207	90	1,076	818	258
SIMI VALLEY	29,209	6,718	3,246	1,701	1,546	1,853	950	903	1,394	752	643
THOUSAND OAKS	34,408	9,118	4,021	2,075	1,945	1,389	726	663	2,632	1,350	1,282
UNINCORP. AREA	27,818	11,072	3,058	1,949	1,109	1,086	678	408	1,972	1,272	701
COUNTY TOTAL	209,380	79,449	30,825	19,036	11,790	8,628	4,980	3,648	22,199	14,059	8,140

TABLE 6: REGIONAL HOUSING NEEDS ASSESSMENT: EXISTING NEED

IMPERIAL COUNTY - LOWER INCOME HOUSEHOLDS PAYING MORE THAN 30% OF INCOME FOR SHELTER (OVERPAYMENT)

	1988 HOUSEHOLDS	LIHHS	LIHHS OVERPAYING FOR SHELTER			TOT-OWNER	LIHH OVERPAYMENT BY TENURE AND INCOME				
			TOTAL	VERY LOW	LOW		VL-OWNER	LOW-OWNER	TOT-RENTER	VL-RENTER	LOW RENTER
BRAWLEY	5,482	2,226	981	606	375	213	142	71	768	464	305
CALEXICO	4,518	2,273	1,048	596	453	239	120	119	809	475	334
CALIPATRIA	719	327	109	66	44	48	23	25	61	43	18
EL CENTRO	9,139	3,253	1,588	932	655	309	190	119	1,279	742	537
HOLTVILLE	1,414	419	176	71	105	59	8	51	116	62	54
IMPERIAL	1,281	427	203	123	81	65	48	17	138	75	64
WESTMORLAND	528	235	62	45	17	17	14	3	45	31	14
UNINCORP. AREA	9,109	4,108	944	597	348	340	208	133	603	389	214
TOTAL COUNTY	32,190	13,267	5,112	3,036	2,078	1,292	754	537	3,819	2,279	1,540

## REGIONAL SUMMARY: EXISTING NEED

COUNTY	1988 HOUSEHOLDS	LIHHS	LIHHS OVERPAYING FOR SHELTER			OWNERS TOTAL	OWNERS VERY LOW	OWNERS LOW	RENTERS TOTAL	RENTERS VERY LOW	RENTERS LOW
			TOTAL	VERY LOW	LOW						
LOS ANGELES	2,962,983	1,201,440	618,531	412,915	205,616	103,791	66,012	37,779	514,739	346,906	167,833
ORANGE	801,989	301,804	124,458	73,591	50,867	24,997	14,559	10,438	99,464	59,030	40,434
RIVERSIDE	335,701	128,914	51,329	28,823	22,506	16,029	8,431	7,598	35,305	20,394	14,911
SAN BERNARDINO	427,801	171,963	70,740	40,324	30,416	23,236	12,532	10,704	47,501	27,789	19,712
VENTURA	209,380	79,449	30,826	19,036	11,790	8,628	4,980	3,648	22,199	14,059	8,140
IMPERIAL	32,190	13,267	5,114	3,036	2,078	1,291	754	537	3,819	2,279	1,540
REGION	4,770,044	1,896,837	900,998	577,725	323,273	177,972	107,268	70,704	723,027	470,457	252,570



## IV. FUTURE NEED



## IV. FUTURE NEED

The Regional Housing Needs Assessment (RHNA) allocates each jurisdiction's share of regional Future Need by adding its growth to the year 1994 to the number of units that would have to be added in each locality in order to meet vacancy rate goals and compensate for anticipated demolitions. These are the Final Revised allocations, reflecting changes made by SCAG in the revision process. Those jurisdictions where revisions were made are designated in the following tables with an "R".

Next, the RHNA distributes the Future Housing Need by four income categories: very low income (less than 50% of the metropolitan area median income), low (50-80%), moderate (80-120%), and high (more than 120%). This income distribution includes an adjustment for avoidance of impaction—the undue concentration of very low and low income households in a jurisdiction. One purpose of the Future Need Allocations by income group is to relieve lower income impaction.

The avoidance of impaction adjustment was performed in two steps. In the first step, every jurisdiction had its existing income distribution--based on 1980 Census information--adjusted "25% of the way" towards the regional average distribution. For most jurisdictions, this became the income distribution for the future needs estimate. For those jurisdictions, however, that remained highly impacted, even after this adjustment, a second adjustment was made to further reduce their lower income proportion. This further adjustment has the effect of bringing all such highly impacted jurisdictions within 20 years to within 10% of the regional average proportion of lower income households, unless such an adjustment would entail reducing the proportion of lower income units by more than one third. Appendix B contains a thorough explanation of these avoidance of impaction adjustments.

Tables 7 through 13 show the allocation of Future Need for each jurisdiction for the 5 year period from July 1, 1989 to June 30, 1994. It is this set of numbers that each jurisdiction must use--as the starting point in anticipating its share of regional growth--in the revised Housing Element of its General Plan, to be adopted by June 30, 1989. Only if it reduces these numbers with the assent of the State HCD for specific reasons may it use other numbers. Advisory allocations, contained in Appendix F, will have SCAG's support if local jurisdictions choose to use them instead.

Tables 14 through 20 show Future Need for each jurisdiction broken down by major factor: growth, vacancy adjustment, and demolition adjustment.





Finally, the State HCD has pointed out to SCAG that localities must account in their Housing Elements for the Future Needs that will have already occurred during the 1 1/2 year "gap" period from January 1, 1988 to June 30, 1989. In order to do this, each jurisdiction should make adjustments to its planning for the 1989-94 period by comparing what will have actually occurred in the 1/88-7/89 "gap" period to the estimated accrual of need displayed in Table 21. In most cases, this difference between the Future Need accrual and actual construction and other events in a community should be very small.

TABLE 7 - LOS ANGELES COUNTY

## REVISED FUTURE HOUSING NEEDS BY INCOME CATEGORY

(25% IMPACTION AVOIDANCE ADJUSTMENT AND FURTHER ADJUSTMENT FOR HIGHLY IMPACTED Localities)						LOWER INC	HIGHER INC
JURISDICTIONS	TOTAL	VL INC	LOW INC	MOD INC	HIGH INC	(%VL & L)	(%MOD & UP)
AGOURA HILLS - R	1,650	160	177	213	1,099	20.5%	79.5%
ALHAMBRA	2,098	387	509	414	788	42.7%	57.3%
ARCADIA	805	109	137	124	436	30.5%	69.5%
ARTESIA	256	41	54	52	108	37.3%	62.7%
AVALON	218	33	52	43	90	39.3%	60.7%
AZUSA	1,535	291	356	320	568	42.2%	57.9%
BALDWIN PARK - R	627	111	151	144	221	41.7%	58.3%
BELL	315	45	69	84	117	36.1%	63.9%
BELLFLOWER	2,239	394	540	447	858	41.7%	58.3%
BELL GARDENS	128	21	30	37	41	39.5%	60.6%
BEVERLY HILLS - R	835	116	162	121	436	33.3%	66.7%
BRADBURY	28	3	4	4	18	23.9%	76.1%
BURBANK - R	2,968	505	640	584	1,239	38.6%	61.4%
CARSON	1,981	260	307	351	1,063	28.6%	71.4%
CERRITOS	1,541	126	143	206	1,067	17.4%	82.6%
CLAREMONT	802	104	123	118	456	28.4%	71.6%
COMMERCE - R	86	15	19	21	31	39.3%	60.7%
COMPTON	2,374	318	510	574	972	34.9%	65.1%
COVINA - R	976	150	191	173	461	35.0%	65.1%
CUDAHY	267	43	69	68	88	41.6%	58.3%
CULVER CITY	1,313	185	227	245	657	31.3%	68.7%
DOWNEY	1,705	271	327	327	780	35.0%	65.0%
DUARTE	995	151	214	209	421	36.7%	63.3%
EL MONTE	2,282	317	461	592	912	34.1%	65.9%
EL SEGUNDO - R	1,112	156	171	224	561	29.4%	70.6%
GARDENA	1,805	288	386	371	759	37.4%	62.6%
GLENDALE - R	5,597	982	1,308	1,059	2,249	40.9%	59.1%
GLENDORA	1,227	154	203	206	664	29.1%	70.9%
HAWAIIAN GARDENS	519	70	96	147	207	32.0%	68.3%
HAWTHORNE	4,977	913	1,073	1,023	1,968	39.9%	60.1%
HERMOSA BEACH - R	513	76	82	95	259	30.9%	69.1%
HIDDEN HILLS	46	3	5	4	34	17.1%	82.9%
HUNTINGTON PARK	1,222	191	304	314	413	40.5%	59.5%
INDUSTRY	94	17	18	30	28	38.0%	62.1%
INGLEWOOD	1,518	202	278	387	652	31.6%	68.4%
IRVINDALE	34	5	8	8	13	38.9%	61.1%
LA CANADA FLNTRG-R	266	22	29	34	181	19.3%	80.7%
LA HABRA HEIGHTS-R	110	10	12	10	78	20.3%	79.7%
LAKEWOOD	1,173	148	181	223	621	28.1%	72.0%
LA MIRADA	1,059	112	136	189	622	23.4%	76.6%
LANCASTER	11,735	1,766	2,379	2,244	5,345	35.3%	64.7%
LA PUENTE	433	78	86	90	179	37.9%	62.1%
LA VERNE	930	137	163	181	449	32.3%	67.7%
LAWDALE	1,027	178	233	204	412	40.0%	60.0%
LOMITA	661	109	157	121	273	40.3%	59.7%
LONG BEACH	12,382	1,754	2,738	2,629	5,262	36.3%	63.7%
LOS ANGELES	129,100	19,804	30,803	24,882	53,611	39.2%	60.8%
LYNWOOD	453	58	85	116	195	31.5%	68.6%

TABLE 7 - CONTINUED

JURISDICTION	TOTAL	VL INC	LOW INC	MOD INC	HIGH INC	LOWER INC (%VL & L)	HIGHER INC (%MOD & UP)
MANHATTAN BEACH -R	1,088	120	137	167	664	23.6%	76.4%
MAYWOOD	293	43	61	79	111	35.5%	64.5%
MONROVIA	927	168	233	179	347	43.3%	56.7%
MONTEBELLO	951	161	216	186	388	39.7%	60.3%
MONTEREY PARK - R	899	141	177	169	412	35.4%	64.6%
NORWALK	1,402	221	268	299	613	34.9%	65.1%
PALMDALE - R	9,755	1,528	2,243	1,852	4,132	38.7%	61.3%
PALOS VERDES EST	313	20	27	31	235	15.2%	84.8%
PARAMOUNT	1,388	187	250	374	577	31.5%	68.5%
PASADENA	3,392	586	880	602	1,323	43.2%	56.8%
PICO RIVERA - R	595	102	120	126	247	37.3%	62.7%
POMONA - R	2,099	345	503	459	792	40.4%	59.6%
RANCHO P. VERDES-R	502	38	46	52	366	16.7%	83.3%
REDONDO BEACH - R	3,032	451	503	575	1,503	31.5%	68.5%
ROLLING HILLS	40	2	4	3	31	15.4%	84.6%
ROLLING HILLS ES-R	30	2	3	3	23	15.4%	84.6%
ROSEMEAD	773	138	182	160	293	41.4%	58.6%
SAN DIMAS	1,302	161	192	217	733	27.1%	72.9%
SAN FERNANDO	307	55	74	68	109	42.2%	57.8%
SAN GABRIEL	881	155	205	174	346	40.9%	59.1%
SAN MARINO - R	18	1	2	2	13	16.3%	83.7%
SANTA FE SPRINGS	304	49	63	64	127	37.0%	63.0%
SANTA MONICA	3,220	569	785	615	1,251	42.0%	58.0%
SIERRA MADRE	173	26	32	30	86	33.3%	66.7%
SIGNAL HILL - R	419	75	101	93	149	42.2%	57.9%
SOUTH EL MONTE	452	66	88	111	187	34.3%	65.8%
SOUTH GATE	898	120	167	222	389	32.0%	68.0%
SOUTH PASADENA	392	63	81	71	178	36.6%	63.4%
SANTA CLARITA - N	6,401	1,031	531	992	3,847	24.4%	75.6%
TEMPLE CITY	403	61	76	77	190	33.9%	66.1%
TORRANCE	4,169	549	655	729	2,237	28.9%	71.1%
VERNON	0	0	0	0	0	0.0%	0.0%
WALNUT	1,402	122	140	189	951	18.7%	81.3%
WEST COVINA	1,150	143	163	212	632	26.6%	73.4%
WEST HOLLYWOOD - R	668	102	140	120	307	36.2%	63.9%
WESTLAKE VILLAGE	467	48	49	64	307	20.6%	79.4%
WHITTIER	1,589	243	333	291	723	36.2%	63.8%
UNINCORPORATED - R	33,867	5,090	7,905	6,226	14,646	38.4%	61.6%
COUNTY TOTAL	291,977	44,369 15.2%	64,042 21.9%	56,146 19.2%	127,423 43.6%	37.1%	62.9%

TABLE 8 - ORANGE COUNTY

## REVISED FUTURE HOUSING NEEDS BY INCOME CATEGORY

(25% IMPACTION AVOIDANCE ADJUSTMENT AND FURTHER ADJUSTMENT FOR HIGHLY IMPACTED LOCALITIES)

JURISDICTION	TOTAL	VL INC	LOW INC	MOD INC	HIGH INC	LOWER INC (%VL & L)	HIGHER INC (%MOD & UP)
ANAHEIM	8,243	1,489	2,055	1,834	2,865	43.0%	57.0%
BREA - R	1,600	237	286	361	716	32.7%	67.3%
BUENA PARK - R	1,060	172	229	263	396	37.8%	62.2%
COSTA MESA - R	3,963	645	891	992	1,435	38.8%	61.3%
CYPRESS	792	104	127	178	383	29.2%	70.8%
FOUNTAIN VALLEY	708	89	97	150	372	26.3%	73.8%
FULLERTON - R	1,437	240	338	303	556	40.2%	59.8%
GARDEN GROVE	2,905	494	674	699	1,038	40.2%	59.8%
HUNTINGTON B - R	6,228	984	1,263	1,369	2,613	36.1%	63.9%
IRVINE - R	13,188	1,678	1,635	2,611	7,263	25.1%	74.9%
LA HABRA	1,082	192	255	243	391	41.3%	58.7%
LA PALMA	147	18	18	30	81	24.2%	75.8%
LAGUNA BEACH	679	109	181	122	268	42.7%	57.3%
LOS ALAMITOS - R	399	69	88	88	154	39.5%	60.6%
MISSION VIEJO - M	4,644	734	529	1,036	2,345	27.2%	72.8%
NEWPORT B - R	2,062	298	409	359	996	34.3%	65.7%
ORANGE	3,857	650	877	824	1,505	39.6%	60.4%
PLACENTIA - R	1,618	235	271	346	766	31.3%	68.7%
SAN CLEMENTE - R	3,237	501	749	723	1,264	38.6%	61.4%
SAN JUAN CAP	1,823	291	367	422	743	36.1%	63.9%
SANTA ANA	5,931	862	1,296	1,641	2,133	36.4%	63.6%
SEAL BEACH	391	49	97	87	158	37.3%	62.6%
STANTON	951	138	193	276	344	34.8%	65.2%
TUSTIN - R	2,085	390	488	484	724	42.1%	57.9%
VILLA PARK	23	2	2	2	17	15.4%	84.6%
WESTMINSTER - R	1,306	205	282	302	517	37.4%	62.7%
YORBA LINDA	4,715	558	585	1,011	2,561	24.2%	75.8%
UNINCORPORATED-R*	24,732	3,575	5,075	5,068	11,014	35.0%	65.0%
COUNTY TOTAL	99,806	15,005	19,358	21,825	43,619	34.4%	65.6%
		15.0%	19.4%	21.9%	43.7%		

\* (includes the Dana Point housing need of 2,526 units)-



TABLE 9 - RIVERSIDE COUNTY

## REVISED FUTURE HOUSING NEEDS BY INCOME CATEGORY

(25% IMPACTION AVOIDANCE ADJUSTMENT AND FURTHER ADJUSTMENT FOR HIGHLY IMPACTED LOCALITIES)

JURISDICTION	TOTAL	VL INC	LOW INC	MOD INC	HIGH INC	LOWER INC (%VL & L)	HIGHER INC (%MOD & UP)
BANNING - R	3,518	500	832	750	1,436	37.9%	62.1%
BEAUMONT	444	72	101	100	171	38.9%	61.0%
BLYTHE	216	37	56	38	85	43.0%	57.0%
CATHEDRAL CITY	5,431	1,010	1,281	949	2,191	42.2%	57.8%
COACHELLA	643	135	137	160	210	42.4%	57.6%
CORONA	3,507	491	648	579	1,789	32.5%	67.5%
DESERT HOT SPGS	1,622	256	363	412	589	38.2%	61.7%
HEMET	3,319	595	756	868	1,100	40.7%	59.3%
INDIAN WELLS	310	31	38	27	214	22.2%	77.8%
INDIO	2,899	532	690	559	1,118	42.2%	57.9%
LA QUINTA	1,262	206	200	231	625	32.2%	67.8%
LAKE ELSINORE	1,629	257	479	366	526	45.2%	54.8%
MORENO VALLEY	17,741	3,375	4,023	3,287	7,056	41.7%	58.3%
MORCO	286	34	43	41	168	27.0%	73.0%
PALM DESERT	1,964	303	367	340	954	34.1%	65.9%
PALM SPRINGS	2,844	533	649	446	1,217	41.6%	58.5%
PERRIS - R	7,509	1,306	1,813	1,771	2,617	41.5%	58.4%
RANCHO MIRAGE	678	112	118	93	355	34.0%	66.0%
RIVERSIDE	8,219	1,347	1,721	1,448	3,704	37.3%	62.7%
SAN JACINTO	2,398	350	664	523	862	42.3%	57.7%
UNINCORPORATED	30,648	5,831	6,949	5,678	12,190	41.7%	58.3%
COUNTY TOTAL	97,087	17,314	21,928	18,667	39,176	40.4%	59.6%
		17.8%	22.6%	19.2%	40.4%		

TABLE 10 - SAN BERNARDINO COUNTY

## FUTURE HOUSING NEEDS BY INCOME CATEGORY

(25% IMPACTION AVOIDANCE ADJUSTMENT AND FURTHER ADJUSTMENT FOR HIGHLY IMPACTED LOCALITIES)

JURISDICTIONS	TOTAL	VL INC	LOW INC	MOD INC	HIGH INC	LOWER INC (%VL & L)	HIGHER INC (%MOD & UP)
ADELANTO	680	109	202	176	192	45.8%	54.2%
BARSTOW	877	137	198	197	344	38.3%	61.8%
BIG BEAR LAKE	784	116	205	131	332	41.0%	59.0%
CHINO	2,447	288	392	439	1,329	27.8%	72.3%
COLTON	3,326	505	693	803	1,326	36.0%	64.0%
FONTANA	6,640	1,004	1,590	1,285	2,761	39.1%	60.9%
GRAND TERRACE	575	72	83	100	321	26.9%	73.1%
HESPIRA - N	1822	435	215	268	904	35.7%	64.3%
HIGHLAND - N	1377	266	205	260	646	34.2%	65.8%
LOMA LINDA	882	136	194	193	358	37.5%	62.5%
MONCLAIR	655	103	142	138	274	37.2%	62.8%
NEEDLES	297	52	76	43	125	43.2%	56.8%
ONTARIO	6,385	1,009	1,333	1,303	2,741	36.7%	63.3%
RANCHO CUCAMONGA	9,568	1,117	1,258	1,729	5,463	24.8%	75.2%
REDLANDS	3,981	593	882	726	1,781	37.1%	63.0%
RIALTO	5,264	803	1,011	1,026	2,424	34.5%	65.5%
SAN BERNARDINO	8,021	1,159	1,865	1,799	3,198	37.7%	62.3%
29 PALMS - N	768	223	118	170	257	44.4%	55.6%
UPLAND	3,641	504	673	666	1,798	32.3%	67.7%
VICTORVILLE	3,542	620	863	718	1,342	41.9%	58.2%
UNINCORPORATED - R	31,123	5,329	8,105	6,148	11,541	43.2%	56.8%
COUNTY TOTAL	92,656	14,580	20,303	18,317	39,457	37.6%	62.4%
		15.7%	21.9%	19.8%	42.6%		

TABLE 11 - VENTURA COUNTY

## REVISED FUTURE HOUSING NEEDS BY INCOME CATAGORY

(25% IMPACTION AVOIDANCE ADJUSTMENT AND FURTHER ADJUSTMENT FOR HIGHLY IMPACTED LOCALITIES)

JURISDICTION	TOTAL	VL INC	LOW INC	MOD INC	HIGH INC	LOWER INC (%VL & L)	HIGHER INC (%MOD & UP)
CAMARILLO	2,921	449	544	616	1,312	34.0%	66.0%
FILLMORE	339	45	71	91	132	34.3%	65.7%
MOORPARK - R	2,741	444	515	706	1,077	35.0%	65.0%
OJAI - R	141	17	28	41	55	32.1%	67.9%
OXNARD	4,354	745	974	1,101	1,534	39.5%	60.5%
PORT HUENEME	644	102	122	188	233	34.7%	65.3%
SAN BUENAVENTURA	4,116	698	1,044	892	1,482	42.3%	57.7%
SANTA PAULA - R	620	83	138	187	211	35.7%	64.3%
SIMI VALLEY	4,781	612	693	1,069	2,407	27.3%	72.7%
THOUSAND OAKS	5,591	791	882	1,086	2,832	29.9%	70.1%
UNINCORPORATED - R	2,879	485	664	570	1,160	39.9%	60.1%
COUNTY TOTAL - R	29,127	4,471 15.4%	5,675 19.5%	6,547 22.5%	12,434 42.7%	34.8%	65.2%

TABLE 12 - IMPERIAL COUNTY

## FUTURE HOUSING NEEDS BY INCOME CATAGORY

(25% IMPACTION AVOIDANCE ADJUSTMENT AND FURTHER ADJUSTMENT FOR HIGHLY IMPACTED LOCALITIES)

JURISDICTION	TOTAL	VL INC	LOW INC	MOD INC	HIGH INC	LOWER INC	HIGHER INC
						(%VL & L)	(%MOD & UP)
BRAWLEY	337	54	82	61	139	40.5%	59.5%
CALEXICO	764	142	159	166	297	39.3%	60.7%
CALIPATRIA	49	11	10	11	17	43.3%	56.7%
EL CENTRO	1,025	161	216	191	457	36.8%	63.3%
HOLTVILLE	84	12	15	17	40	32.2%	67.8%
IMPERIAL	209	32	41	50	86	35.0%	65.0%
WESTMORELAND	35	7	8	7	12	43.5%	56.5%
UNINCORPORATED	1,128	206	272	203	447	42.4%	57.6%
COUNTY TOTAL	3,631	626	802	707	1,495	39.3%	60.7%
		17.2%	22.1%	19.5%	41.2%		



TABLE 13 - COUNTY SUMMARY

REVISED FUTURE HOUSING NEEDS BY INCOME CATEGORY - 7/89 TO 7/94 (ADJUSTED) LOCALITIES)

(25% IMPACTION AVOIDANCE ADJUSTMENT AND FURTHER ADJUSTMENT FOR HIGHLY IMPACTED						LOWER INCOME (%VL & L)	HIGHER INC (%MOD & UP)
COUNTY	FUTURE NEED	VL INC	LOW INC	MOD INC	UP INC	37.1%	62.9%
LOS ANGELES - R	291,977	44,369	64,042	56,146	127,423	34.4%	65.6%
ORANGE - R	99,806	15,005	19,358	21,825	43,619	34.8%	65.2%
VENTURA - R	29,127	4,471	5,675	6,547	12,434	37.6%	62.4%
SAN BERNARDINO	92,656	14,580	20,303	18,317	39,457	40.4%	59.6%
RIVERSIDE - R	97,087	17,314	21,928	18,667	39,176	39.3%	60.7%
IMPERIAL	3,631	626	802	707	1,495	37.2%	62.8%
REGION - R	614,283	96,365 15.7%	132,109 21.5%	122,209 19.9%	263,604 42.9%		

TABLE 14

## REVISED RHNA FUTURE NEEDS FACTORS

## LOS ANGELES COUNTY

JURISDICTION	FIVE YEAR 7/89-7/94 FUTURE NEED	HOUSEHOLD GROWTH 7/89-7/94	TOTAL VACANCY ADJUSTMENT	DEMOLITION ADJUSTMENT
AGOURA HILLS	1,650	1,654	-16	12
ALHAMBRA	2,100	1,151	528	422
ARCADIA - R	805	500	133	172
ARTESIA	256	98	96	62
AVALON	218	189	7	22
AZUSA	1,535	1,101	126	308
BALDWIN PARK - R	627	358	17	252
BELL	315	25	217	73
BELLFLOWER	2,241	1,668	332	242
BELL GARDENS	128	18	48	62
BEVERLY HILLS-R	835	470	213	152
BRADBURY	28	18	4	5
BURBANK - R	2,970	2,175	115	680
CARSON	1,982	1,565	351	67
CERRITOS	1,541	1,245	270	25
CLAREMONT	801	668	107	25
COMMERCE - R	86	0	0	86
COMPTON	2,374	1,328	397	648
COVINA - R	976	743	141	92
CUDAHY	267	142	75	50
CULVER CITY	1,312	762	522	28
DOWNEY	1,705	1,005	507	193
DUARTE	995	791	160	45
EL MONTE	2,282	1,527	592	163
EL SEGUNDO - R	1,112	844	115	153
GARDENA	1,806	1,294	248	263
GLENDALE - R	5,601	4,048	641	912
GLENDORA	1,227	980	162	85
HAWAIIAN GARDENS	519	367	74	78
HAWTHORNE	4,977	2,468	734	1,775
HERMOSA BEACH-R	513	161	104	248
HIDDEN HILLS	46	42	2	2
HUNTINGTON PARK	1,222	139	347	735
INDUSTRY	94	86	3	5
INGLEWOOD	1,518	705	136	677
IRWINDALE	34	15	0	18
LA CANADA FL.-R	266	198	60	8
LA HABRA HGTS-R	110	93	12	5
LAKEWOOD	1,173	748	399	25
LA MIRADA	1,058	792	263	3

TABLE 14

REVISED RHNA FUTURE NEEDS FACTORS

LOS ANGELES COUNTY

JURISDICTION	FIVE YEAR 7/89-7/94 FUTURE NEED	HOUSEHOLD GROWTH 7/89-7/94	TOTAL VACANCY ADJUSTMENT	DEMOLITION ADJUSTMENT
LANCASTER	11,735	10,980	699	57
LA PUENTE	433	248	142	43
LA VERNE	930	855	60	15
LAWDALE	1,027	778	41	207
LOMITA	661	418	158	85
LONG BEACH	12,382	9,479	1,646	1,257
LOS ANGELES	129,100	82,501	33,704	12,895
LYNWOOD	453	225	103	125
MANHATTAN B.-R	1,088	645	20	423
MAYWOOD	293	42	193	58
MONROVIA	928	715	8	205
MONTEBELLO	951	294	545	112
MONTEREY PARK-R	900	483	187	230
NORWALK	1,401	988	343	70
PALMDALE - R	9,762	10,058	-319	22
PALOS VERDES EST	312	278	29	5
PARAMOUNT	1,387	1,044	164	178
PASADENA	3,389	1,979	866	543
PICO RIVERA - R	595	370	123	102
POMONA - R	2,097	1,972	-72	197
RANCHO P.V. - R	502	430	69	3
REDONDO BEACH-R	3,030	1,825	282	923
ROLLING HILLS	40	25	2	13
ROLLING H. ES.-R	30	22	5	3
ROSEMEAD	773	399	117	257
SAN DIMAS	1,301	1,152	149	0
SAN FERNANDO	307	220	64	23
SAN GABRIEL	881	592	124	165
SAN MARINO - R	18	2	14	2
SANTA FE SPRINGS	304	200	92	12
SANTA MONICA	3,218	1,338	1,737	143
SIERRA MADRE	173	108	31	33
SIGNAL HILL - R	419	354	33	32
SOUTH EL MONTE	452	260	106	87
SOUTH GATE	899	88	481	330
SOUTH PASADENA	392	186	156	50
SANTA CLARITA-N	6,401	5,774	475	152
TEMPLE CITY	403	282	56	65
TORRANCE	4,169	2,659	1,353	157
VERNON-R	0	0	0	0
WALNUT	1,403	1,369	24	10
WEST COVINA-R	1,150	941	166	43
WEST HOLLYWOOD	668	206	445	17
WESTLAKE VILLAGE	467	448	17	2
WHITTIER	1,589	780	612	197
UNINCORPORATED	33,866	29,668	3,024	1,173
TOTAL IN COUNTY	291,983	205,864	56,518	29,598

TABLE 15  
REVISED RHNA FUTURE NEEDS FACTORS      ORANGE COUNTY

JURISDICTION	FIVE YEAR 7/89-7/94 FUTURE NEED	HOUSEHOLD GROWTH 7/89-7/94	TOTAL VACANCY ADJUSTMENT	DEMOLITION ADJUSTMENT
ANAHEIM	8,243	6,129	1,655	458
BREA - R	1,600	1,372	117	112
BUENA PARK - R	1,061	756	227	78
COSTA MESA - R	3,963	3,467	421	75
CYPRESS	792	562	210	20
FOUNTAIN VALLEY	708	655	48	5
FULLERTON-R	1,437	1,011	353	73
GARDEN GROVE	2,905	1,786	853	267
HUNTINGTON B.-R	6,228	5,360	730	138
IRVINE - R	13,188	12,673	513	2
LA HABRA	1,082	768	244	70
LA PALMA	147	66	81	0
LAGUNA BEACH	679	525	100	55
LOS ALAMITOS - R	399	266	53	80
NEWPORT BEACH-R	2,062	1,774	-77	365
ORANGE	3,857	3,055	647	155
PLACENTIA-R	1,618	1,501	99	18
SAN CLEMENTE-R	3,237	2,927	275	35
MISSION VIEJO-N	4,644	4,453	176	14
SAN JUAN CAP	1,823	1,663	157	3
SANTA ANA	5,931	4,211	746	975
SEAL BEACH	391	270	58	63
STANTON	951	685	227	40
TUSTIN - R	2,085	1,751	267	67
VILLA PARK	23	8	14	2
WESTMINSTER-R	1,306	975	249	82
YORBA LINDA	4,715	4,615	62	38
UNINC. COUNTY-R	22,228	21,258	888	82
DANA POINT - N	2,504	2,412	83	9
TOTAL IN COUNTY	99,808	86,951	9,474	3,382



TABLE 16  
REVISED RHNA FUTURE NEEDS FACTORS      RIVERSIDE COUNTY

JURISDICTION	FIVE YEAR 7/89-7/94 FUTURE NEED	HOUSEHOLD GROWTH 7/89-7/94	TOTAL VACANCY ADJUSTMENT	DEMOLITION ADJUSTMENT
BANNING-R	3,515	3,383	97	35
BEAUMONT	444	416	12	15
BLYTHE	216	127	9	80
CATHEDRAL CITY	5,431	5,259	172	0
COACHELLA	643	528	102	12
CORONA	3,507	3,250	181	77
DESERT HOT SPGS	1,622	1,564	52	7
HEMET	3,319	3,175	111	33
INDIAN WELLS	310	300	9	2
INDIO	2,899	2,776	103	20
LA QUINTA	1,263	1,235	29	0
LAKE ELSINORE	1,629	1,565	52	12
MORENO VALLEY	17,741	17,410	316	15
NORCO	286	495	-210	0
PALM DESERT	1,964	1,891	54	18
PALM SPRINGS	2,844	2,742	96	7
PERRIS-R	7,509	7,228	249	32
RANCHO MIRAGE	678	622	16	40
RIVERSIDE	8,213	8,730	-857	340
SAN JACINTO	2,398	2,253	122	23
UNINCORPORATED	30,648	29,473	925	250
TOTAL IN COUNTY	97,080	94,422	1,642	1,017

TABLE 17  
REVISED RHNA FUTURE NEEDS FACTORS      SAN BERNARDINO COUNTY

JURISDICTION	FIVE YEAR 7/89-7/94 FUTURE NEED	HOUSEHOLD GROWTH 7/89-7/94	TOTAL VACANCY ADJUSTMENT	DEMOLITION ADJUSTMENT
ADELANTO	680	653	26	2
BARSTOW	877	772	96	8
BIG BEAR LAKE	785	722	18	45
CHINO	2,447	2,462	-126	112
COLTON	3,326	3,421	-125	30
FONTANA	6,640	6,509	33	98
GRAND TERRACE	575	658	-83	0
LOMA LINDA	882	853	27	2
MONTCLAIR	655	581	68	7
NEEDLES	297	268	21	8
ONTARIO	6,385	6,647	-359	97
RANCHO CUCAMONGA	9,568	9,057	496	15
REDLANDS	3,981	4,027	-109	63
RIALTO	5,260	5,377	-151	33
SAN BERNARDINO	8,021	8,838	-1,210	393
UPLAND	3,641	3,467	154	20
VICTORVILLE	3,542	3,602	-85	25
HESPERIA - N	1,822	2,006	-184	0
HIGHLAND - N	1,377	1,517	-140	0
TWENTY-NINE P.-N	768	940	-172	0
UNINCORPORATED	31,126	30,315	811	0
COUNTY TOTAL	92,656	92,691	-993	958

TABLE 18  
REVISED RHNA FUTURE NEEDS FACTORS                      VENTURA COUNTY

JURISDICTION	FIVE YEAR 7/89-7/94 FUTURE NEED	HOUSEHOLD GROWTH 7/89-7/94	TOTAL VACANCY ADJUSTMENT	DEMOLITION ADJUSTMENT
CAMARILLO	2,923	2,598	293	32
FILLMORE	339	269	44	25
MOORPARK-R	2,743	2,750	-12	5
OJAI - R	141	112	21	8
OXNARD	4,354	3,341	965	48
PORT HUENEME	644	540	99	5
SAN BUENAVENTURA	4,116	3,507	566	43
SANTA PAULA-R	620	487	96	37
SIMI VALLEY	4,781	4,132	610	38
THOUSAND OAKS	5,591	5,038	512	42
UNINC. COUNTY-R	2,879	2,576	214	88
TOTAL IN COUNTY	29,131	25,350	3,409	372

TABLE 19  
REVISED RHNA FUTURE NEEDS FACTORS                      IMPERIAL COUNTY

JURISDICTION	FIVE YEAR 7/89-7/94 FUTURE NEED	HOUSEHOLD GROWTH 7/89-7/94	TOTAL VACANCY ADJUSTMENT	DEMOLITION ADJUSTMENT
BRAWLEY	337	385	-61	14
CALEXICO	763	655	97	12
CALIPATRIA	49	46	1	2
EL CENTRO	1,025	1,172	-170	24
HOLTVILLE	84	92	-12	4
IMPERIAL	209	209	-3	3
WESTMORELAND	35	33	1	1
UNINCORPORATED	1,128	1,032	72	24
COUNTY TOTAL	3,632	3,624	-75	83

TABLE 20  
REVISED RHNA FUTURE NEEDS FACTORS      COUNTY SUMMARY

COUNTY	FIVE YEAR 7/89-7/94 FUTURE NEED	HOUSEHOLD GROWTH 7/89-7/94	TOTAL VACANCY ADJUSTMENT	DEMOLITION ADJUSTMENT
LOS ANGELES	291,983	205,864	56,518	29,598
ORANGE	99,808	86,951	9,474	3,382
RIVERSIDE	97,080	94,422	1,642	1,017
SAN BERNARDINO	92,656	92,691	-993	958
VENTURA	29,131	25,350	3,409	372
IMPERIAL	3,632	3,624	-75	83
REGION	614,289	508,901	69,974	35,410



TABLE 21  
REVISED RHNA FUTURE NEEDS FOR  
JAN. 1988 - JUNE 1989 "GAP" PERIOD  
LOS ANGELES

JURISDICTION

AGOURA HILLS	512
ALHAMBRA	484
ARCADIA - R	206
ARTESIA	49
AVALON	65
AZUSA	435
BALDWIN PARK - R	186
BELL	30
BELLFLOWER	590
BELL GARDENS	24
BEVERLY HILLS-R	192
BRADBURY	7
BURBANK - R	879
CARSON	502
CERRITOS	390
CLAREMONT	213
COMMERCE - R	26
COMPTON	605
COVINA - R	257
CUDAHY	59
CULVER CITY	245
DOWNEY	369
DUARTE	258
EL MONTE	522
EL SEGUNDO - R	308
GARDENA	481
GLENDALE - R	1,534
GLENDORA	327
HAWAIIAN GARDENS	137
HAWTHORNE	1,302
HERMOSA BEACH-R	125
HIDDEN HILLS	13
HUNTINGTON PARK	264
INDUSTRY	28
INGLEWOOD	423
IRWINDALE	10
LA CANADA FL.-R	63
LA HABRA HGTS-R	30
LAKEWOOD	238
LA MIRADA	245

JURISDICTION

LANCASTER	3,415
LA PUENTE	90
LA VERNE	268
LAWNDALE	303
LOMITA	155
LONG BEACH	3,325
LOS ANGELES	29,515
LYNWOOD	107
MANHATTAN B.-R	326
MAYWOOD	30
MONROVIA	283
MONTEBELLO	125
MONTEREY PARK-R	218
NORWALK	326
PALMDALE - R	3,119
PALOS VERDES EST	87
PARAMOUNT	377
PASADENA	777
PICO RIVERA - R	144
POMONA - R	669
RANCHO P.V. - R	133
REDONDO BEACH-R	845
ROLLING HILLS	12
ROLLING H. ES.-R	8
ROSEMEAD	200
SAN DIMAS	355
SAN FERNANDO	75
SAN GABRIEL	233
SAN MARINO - R	1
SANTA FE SPRINGS	65
SANTA MONICA	462
SIERRA MADRE	43
SIGNAL HILL - R	120
SOUTH EL MONTE	106
SOUTH GATE	126
SOUTH PASADENA	73
SANTA CLARITA-N	1,826
TEMPLE CITY	106
TORRANCE	871
VERNON - R	0
WALNUT	422
WEST COVINA - R	303
WEST HOLLYWOOD-R	70
WESTLAKE VILLAGE	139
WHITTIER	300
UNINCORPORATED	9,504
TOTAL IN COUNTY	72,687

TABLE 21  
REVISED RHNA FUTURE NEEDS FOR  
JAN. 1988 - JUNE 1989 "GAP" PERIOD

ORANGE COUNTY		RIVERSIDE	
JURISDICTION	1/88-7/89 NEED		
ANAHEIM	2,041	BANNING-R	1,055
BREA - R	458	BEAUMONT	133
BUENA PARK - R	257	BLYTHE	63
COSTA MESA - R	1,100	CATHEDRAL CITY	1,629
CYPRESS	179	COACHELLA	167
FOUNTAIN VALLEY	203	CORONA	1,027
FULLERTON-R	335	DESERT HOT SPGS	487
GARDEN GROVE	633	HEMET	996
		INDIAN WELLS	93
HUNTINGTON B.-R	1,701	INDIO	870
IRVINE - R	3,910	LA QUINTA	379
LA HABRA	259	LAKE ELSINORE	489
LA PALMA	20	MORENO VALLEY	5,355
LAGUNA BEACH	179	NORCO	152
LOS ALAMITOS - R	107	PALM DESERT	589
NEWPORT BEACH-R	659	PALM SPRINGS	853
ORANGE	990	PERRIS - R	2,251
PLACENTIA-R	469	RANCHO MIRAGE	203
SAN CLEMENTE-R	917	RIVERSIDE	2,800
MISSION VIEJO-N	1,383	SAN JACINTO	707
SAN JUAN CAP	514	UNINCORPORATED	9,195
SANTA ANA	1,599		
SEAL BEACH	103	TOTAL IN COUNTY	29,491
STANTON	225		
TUSTIN - R	566		
VILLA PARK	3		
WESTMINSTER-R	326		
YORBA LINDA	1,427		
UNINC. COUNTY-R	6,593		
DANA POINT - N	726		
TOTAL IN COUNTY	27,882		

RHNA FUTURE NEEDS TOTALS FOR  
JAN. 1988 - JUNE 1989 "GAP" PERIOD

SAN BERNARDINO

JURISDICTION

ADELANTO	204
BARSTOW	241
BIG BEAR LAKE	236
CHINO	793
COLTON	1,069
FONTANA	2,039
GRAND TERRACE	203
LOMA LINDA	265
	0
MONTCLAIR	182
NEEDLES	85
ONTARIO	2,085
RANCHO CUCAMONGA	2,797
REDLANDS	1,263
RIALTO	1,666
SAN BERNARDINO	2,853
UPLAND	1,078
VICTORVILLE	1,123
HESPERIA - N	617
HIGHLAND - N	468
TWENTY-NINE P.-N	289
UNINCORPORATED	9,338
COUNTY TOTAL	28,893

VENTURA

JURISDICTION

CAMARILLO	810
FILLMORE	91
MOORPARK - R	848
OJAI - R	37
OXNARD	1,049
PORT HUENEME	169
SAN BUENAVENTURA	1,098
SANTA PAULA-R	162
SIMI VALLEY	1,283
THOUSAND OAKS	1,564
UNINC. COUNTY-R	819
TOTAL IN COUNTY	7,929

REVISED RHNA FUTURE NEEDS FOR  
JAN. 1988 - JUNE 1989 "GAP" PERIOD

IMPERIAL COUNTY		COUNTY SUMMARY	
JURISDICTION	1/88-7/89 NEED	COUNTY	1/88-7/89 NEED
BRAWLEY	119	LOS ANGELES	72,687
CALEXICO	202	ORANGE	27,882
CALIPATRIA	14	RIVERSIDE	29,491
EL CENTRO	363	SAN BERNARDINO	28,893
HOLTVILLE	29	VENTURA	7,929
IMPERIAL	65	IMPERIAL	1,122
WESTMORELAND	10		
UNINCORPORATED	320	REGION	168,003
COUNTY TOTAL	1,122		





# A

APPEALS PROCEDURES  
FOR JURISDICTIONS AND  
GROUNDS FOR APPEAL



**APPENDIX A**  
**APPEALS PROCEDURES FOR JURISDICTIONS**  
**AND GROUNDS FOR APPEAL**

**PART I**

**PURPOSE**

State law requires that local General Plans contain a Housing Element that reasonably complies with Article 10.6 (Housing Elements) of the Government Code (Section 65580, *et seq.*). The Element shall contain “an assessment of housing needs”; “existing and projected needs shall include the locality’s share of the regional housing need in accordance with (Government Code) Section 65584.” (Govt. Code Section 65583 (a).)

Government Code Section 65584 provides that:

“Based upon data provided by the Department of Housing and Community Development relative to the statewide need for housing, each council of governments shall determine the existing and projected housing need for its region.”

SCAG, the council of governments for this region, has prepared a Regional Housing Needs Assessment (RHNA). The SCAG Regional Housing Needs Assessment (RHNA) is a comprehensive document analyzing housing needs in every jurisdiction in the region. It responds to state criteria for such assessments to be used in the local housing planning process. A jurisdiction that differs with its share of regional housing needs set forth in the RHNA may submit a revised share and/or alternative data to SCAG for its review. Procedures and Criteria Guidelines have been adopted pursuant to Government Code Section 65584. The State Housing Law is set out in Appendix C of the RHNA.

**PART II**

**PROCEDURES**

1. The Regional Housing Needs Assessment (RHNA) is approved by the Executive Committee, and distributed to cities and counties in the region on July 1, 1988.

2. A jurisdiction wishing to substitute a revised definition of its share and/or alternative data must do so within the 90-day period from July 1, 1988 to September 29, 1988. Upon receipt of a request to substitute alternative data, SCAG has 60 days in which to respond. The statute allows no extensions beyond the 90-day period. All requests from jurisdictions for revisions must be signed by a city manager, county chief administrative officer, or the chief elected official.
3. Requests received will be reviewed by staff and policy committees to identify and establish the nature of conflicts. Comments received will serve as the formal notification of a discrepancy which a jurisdiction wishes to resolve.
4. SCAG staff will enter into discussions with appropriate local jurisdiction staff and attempt to resolve the discrepancy. All proposed changes will be referred to the CEHD Committee for review and recommendation to the Executive Committee, which must act to either accept the revision or state why it is inconsistent with the regional housing needs.

### **PART III**

## **GROUND'S FOR APPEAL**

### **Introduction and Background**

Government Code Section 65584 (a) provides:

“(a) For purposes of subdivision (a) of Section 65583, a locality’s share of the regional housing needs includes that share of the housing need of persons at all income levels within the area significantly affected by a jurisdiction’s general plan. The distribution of regional housing needs shall, based upon available data, take into consideration market demand for housing, employment opportunities, the availability of suitable sites and public facilities, commuting patterns, type and tenure of housing need, and the housing needs of farmworkers. The distribution shall seek to avoid further impaction of localities with relatively high proportions of lower income households. Based upon data provided by the Department of Finance, in consultation with each council of government, the Depart-

ment of Housing and Community Development shall determine the regional share of the statewide housing need at least two years prior to the second revision, and all subsequent revisions as required pursuant to Section 65588. Based upon data provided by the Department of Housing and Community Development relative to the statewide need for housing, each council of governments shall determine the existing and projected housing need for its region. Within 30 days following notification of this determination, the Department of Housing and Community Development shall ensure that this determination is consistent with the statewide housing need and may revise the determination of the council of governments if necessary to obtain this consistency. Each locality's share shall be determined by the appropriate council of governments consistent with the criteria above with the advice of the department subject to the procedure established pursuant to subdivision (c) at least one year prior to the second revision, and at five-year intervals following the second revision pursuant to Section 65588."

Government Code Section 65584 (c) provides:

"(c) Within 90 days following a determination of a council of governments pursuant to subdivision (a), or the department's determination pursuant to subdivision (b), a local government may revise the determination of its share of the regional housing need in accordance with the considerations set forth in subdivision (a). The revised share shall be based upon available data and accepted planning methodology, and supported by adequate documentation. Within 60 days after the time period for the local government's revision, the council of governments or the department, as the case may be, shall accept the revision or shall indicate, based upon available data and accepted planning methodology, why the revision is inconsistent with the regional housing need. The housing element shall contain an analysis of the factors and circum-



stances, with all supporting data, justifying the revision. All materials and data used to justify any revision shall be made available upon request by an interested party within seven days upon payment of reasonable costs of reproduction unless the costs are waived due to economic hardship.”

## **A. Definitions**

These definitions apply to all requests for revision of the RHNA data and constitute the basis of the test for acceptability of alternative data. In all cases, the data must, at minimum, apply to or be consistent with one of the seven criteria listed in Section 65584 (a) of the legislation. It should be noted that the statutes do not adequately define such important terms as housing need, housing demand, and the relationship between the two.

1. “Accepted Planning Methodology”: Logical organization and analysis of data that is consistent, accurate and current in a manner that allows replication.
2. “Accurate”: Data which are reasonably free from defect.
3. “Available Data”: Data which is generally accessible to the public and are not constrained by proprietary conditions, or other circumstances rendering them difficult to obtain or process.
4. “Consistent”: Data which are consistent with the seven criteria listed in Section 65584 (a). These seven criteria are:
  - (a) market demand for housing;
  - (b) employment opportunities;
  - (c) availability of suitable sites and public facilities;
  - (d) commuting patterns;
  - (e) type and tenure of housing need;
  - (f) the housing needs of farmworkers, and
  - (g) avoidance of further impaction of localities with relatively high proportions of lower income households.

5. "Current": Data less than two years old, with the exception of vacancy data (one year old or less).
6. "Existing Need": Those lower income households paying an inordinate share of their incomes for rent and/or housing payments. This "inordinate share" is defined as more than 30 percent of gross household income.
7. "Housing Need": Households currently residing in the region which are inadequately housed are called "Existing Need." Those households which will reside in the region in the future plus additional units needed to achieve ideal vacancy rates and compensate for demolitions are called "Future Need."
8. "Lower Income": Households having incomes lower than 80% of the Median Household Income for the metropolitan area.
9. "Replicable": Can be exactly reproduced using the same methodology and data.
10. "Supported by adequate documentation": Methods used for acquiring and/or computing alternative data must be fully explained, and incorporated into the request directly, or by reference.

## **B. Revised Share**

A local jurisdiction may submit a revised definition of its share of the regional housing need. The revised share shall be based upon available data and accepted planning methodology and shall be supported by adequate documentation. The data and planning methodology must be consistent with the seven criteria listed in the statute.

## **C. Alternative Data**

The basic adequacy of alternative data shall be determined by the extent to which they are current, accurate, and consistent with other known data, and result from the application of sound and replicable methodology. Further, they must address one or more of the seven criteria listed in the statute:

1. **Market Demand for Housing:**

- (a) Considered only in the context of additional Future Need demand.
- (b) **Future Need.** The number of additional units needed in each jurisdiction based on households who are expected to reside within the various jurisdictions (future demand), plus an adequate supply of vacant housing -- (both for rent and for sale) -- to assure mobility, and units to replace losses.

Data elements needed to compute "Future Need" based on this definition are (per jurisdiction):

(1) **Future Population:**

**SCAG Data Source:**

Future housing unit growth at the regional and jurisdictional levels, is used to generate household growth. Such data is developed in the 1988 Growth Management Plan (GMP). The data is further interpolated to determine July, 1994 levels. A more complete explanation of this process is contained in Appendix B.

**Alternative Local Data:**

Methodologically sound population forecasts based on regional demographic factors (fertility rates, birth and death rates, net migration, etc.) which determine regional growth and influence its distribution among the various housing market areas (subregions). Further deviations from SCAG's distribution of household growth (or population) within RSAs must be agreed to by all affected jurisdictions.

(2) **Future Household Size:**

**SCAG Data Source:**

1980 Census provides the base data for current household size. Future average household size, for the region is based on an extensive analysis of demo-

graphic trends in the Baseline Study, by which GMP regional totals were determined. In each jurisdiction, it is based on demographic trends observed at the subregional level.

**Alternative Local Data:**

Trend line analysis and/or demographically based projections of future household sizes based on local survey data.

**(3) Future Households:**

This is a mathematical task which divides future household population by future household size to produce the number of future households.

**(4) Household Income Distribution:**

1980 Census Data (Third Count) has been used. It was assumed that the 1980 distribution within jurisdictions did not change during the intervening period, thus the 1987 distribution is the same as for 1980.

**Alternative Local Data:**

A current, statistically significant survey, or an analysis of comprehensive data sets such as IRS or State Franchise Tax Board information which yields a comparable and methodologically sound set of estimates.

**(5) Desired Vacancy Rate:**

**SCAG Data Source:**

An ideal standard of 2% for ownership units and 5% for rental units within each jurisdiction. Each jurisdiction's number of single-family and multiple-family units were used as surrogates for ownership and rental units, respectively.

**Alternative Local Data:**

Historical data based on field records, covering sev-

eral building cycles, or ten years prior, indicating why another vacancy standard is more appropriate to allow for resident mobility and turnover. Reliable data on actual tenure within the jurisdiction.

**(6) Current Vacancies:**

**SCAG Data Source:**

The most recent Federal Home Loan Bank Postal Vacancy Surveys. State Department of Finance "other vacant" housing statistics.

**Alternative Local Data:**

Other scientifically sound and verifiable sample surveys with documentation and capability of being replicated. Evidence that the second home community adjustment does not apply to the jurisdiction from a generally available source of information.

**(7) Housing Unit Losses:**

**SCAG Data Source:**

Average unit losses per year in same quantities as average actual demolitions in 1984-86 period.

**Alternative Local Data:**

Local data on housing unit losses covering at least the last ten years. Documentation of reasons for future estimates if other than an extrapolation of past trends. Alternative data must include: recorded demolitions, conversions to and from residential uses, accidental losses.

**2. Employment Opportunities and Commuting Patterns:**

Both considered by SCAG in the "Job/Housing Balance" adjustments made to the 1987 Baseline forecast to arrive at the 1988 GMP. The commuting patterns of the Baseline forecast, which was based on trend, were studied as part of the Regional Mobility Plan effort. It was found that adjustments to Baseline, in the form of changing



some future housing and job patterns would avoid the necessity of attempting to provide many massive transportation improvements in a short time. As a result, employment is located closer to residences and commuting patterns are more rational and less congested than they would otherwise have been.

**Alternative Local Data:**

Methodologically sound analysis of local conditions that lead to a conclusion that forecast levels of jobs or housing will not occur due to objective conditions.

**3. Availability of Suitable Sites and Public Facilities:**

The GMP effort evaluated the capacity of each jurisdiction to accommodate forecasted levels of housing in the year 2010.

**Alternative Local Data:**

Objective factors (e.g. geologic conditions, toxic waste sites) that would preclude use of certain sites in a way that would reduce the capacity of a jurisdiction below forecasted levels.

**4. Type and Tenure of Housing Need:**

**SCAG Data Source:**

1980 Census Data. Percentage breakdown applied to Existing housing levels.

**Alternative Local Data**

Scientifically sound and verifiable sample surveys with documentation and capability of being replicated.

**5. Avoidance of further impaction of lower income households** is defined as avoidance of any action leading to a higher concentration of lower income households than the regional percentage in a jurisdiction. (The definition of impaction is a SCAG Policy determination.) In practical terms, this implies a shift in the income distribution between the various jurisdictions over time.

For example, this may be done by reducing an impacted community's concentration of lower income households and the opposite

for a higher income jurisdiction. (Assuming no loss in the regional total of households.)

The data elements needed to measure levels of impact are:

- current household income distribution by jurisdiction;
- current household income distribution for the region; and
- **a policy objective for reducing impact.**

Recommendations on this policy objective have been determined by local elected officials on SCAG's Policy Committee and are incorporated in the RHNA Future Need identification.

**Alternative Local Data:**

"Locally derived alternatives for the revised income distribution will be considered under the following condition:

Local policies and methods can be submitted which affect future income distributions, specifically to avoid further local impact, in situations where the RHNA distribution does not "significantly reduce local impact;"

6. **Farmworker Needs.** SCAG has used data from State HCD on the special needs of farmworkers, as required by the housing element law.

Local data on this factor is encouraged as a subset of "current needs."

# B

METHODOLOGY  
USED IN NEEDS  
IDENTIFICATION



## APPENDIX B

### METHODOLOGY USED IN NEEDS IDENTIFICATION

#### I. EXISTING NEED

##### **Methodology:**

The projection of households in need (lower income households paying over 30% of income for housing) was based on the percentage increase or decrease of total households in a locality between 1980 and 1988. If the percentage change in households was a plus 10%, then the proportion of households in the lower income categories was increased exactly 10%. This “scaling up” was accomplished in the following manner:

The first step was to take the RHAM 83 local jurisdiction percentage split between income groups (based on 1980 census data) and apply it to the household total for 1988. In this way, an estimate of the number of the number households in each income category was derived.

The second step was to assume that households in need would be in the same ratio to non-overpaying lower income households as in 1980. The ratio for each jurisdiction’s low and moderate income categories was used to get a gross estimate of households in need for each category. The percentage breakdowns between income groups and the breakdown by owner-renter categories were based on 1980 census information on income and tenure type. No more recent data on household incomes was available at the jurisdiction level which satisfied the needs of our analysis or state law (i.e. generally available data, replicable methodology for all jurisdictions, etc.).

##### **Further Adjustments**

The number of low and moderate income households in need could be adjusted downward by the number of households assisted by government subsidy programs which reduce shelter payments to no more than 30% of household income (e.g. lower income households assisted by Section 8 housing assistance payments or Public Housing subsidies). This adjustment would be made by local governments, outside the RHNA adoption process, when the local housing element is developed.



On the other hand, the number of lower income households in need could be adjusted upward to account for the impact of homeless persons on the jurisdiction (households in need that are not living in an occupied unit). This adjustment would also be made outside of the RHNA adoption process. As provided in the new state law (AB 1996), the homeless needs assessment could be performed as part of the required "identification of adequate sites for emergency shelters," required in local housing elements.

## **II. FUTURE NEED**

### **Total Future Need:**

The total future need for the five-year 1989-1994 period for each jurisdiction was determined according to a method which took into consideration the growth in the number of households expected, the need to achieve ideal vacancy rates, and compensation for anticipated demolition. Where revisions were made as a result of local appeal, the jurisdiction's name is followed by "R" in the tables for the factor which was revised.

The following Tables 22 through 28, 29 through 35, and 36 through 42, show the Methodological Steps in arriving at the "RHNA FUTURE NEEDS & FACTORS" in Tables 14 through 20. They are based on the total GMP number of households forecasted for each jurisdiction for July 1994. The following steps were taken in constructing the table:

### **TABLES 22 through 28 (Revised Household Growth):**

- Step 1: "Total January, 1988 Households" (column 2): were obtained from the California Department of Finance (DOF). They correspond to DOF's estimate of occupied housing units in each jurisdiction for that date.
- Step 2: "Total July, 1994 Households" (column 3): were obtained from GMP forecasts for that year.
- Step 3: "Household Growth 7/89-7/94" (column 4): This is total estimated household growth for the 5 years from July, 1989 to July 1, 1994 (the RHNA Future Need horizon). It was derived for each jurisdiction by multiplying its 1988-94 household growth (column 3 minus

column 2) by 10/13, which is the proportion of the number of months in the shorter period compared to the longer period.

**TABLES 29 through 35 (Revised Vacancy Adjustment):**

- Step 4:** “Total Housing Units January 1988” (column 1): Were obtained from DOF.
- Step 5:** “Single Family Proportion January 1988 (Column 2): Were obtained from DOF.
- Step 6:** “Ideal Vacancy Rate January 1988” (Column 3): Calculated by multiplying single family unit proportion by 2 and remaining proportion by 5, to equal a 2% vacancy rate for single family units, and a 5% vacancy rate for other units.
- Step 7:** “1987 Actual Vacancy Rate” (column 4): This is from the Federal Home Loan Bank Board’s most recently available survey by zip codes. SCAG staff constructed a jurisdiction rate by adding and/or splitting zip code rates. Latest rates available for Imperial County jurisdictions were for 1983, and are from the 1983 RHAM.
- Step 8:** “Existing Vacancy Need” (column 5): This is the number of additional or fewer units that would be needed in each jurisdiction to bring its vacancy rate to the ideal rate. It is derived by subtracting the quotient of 1987 Vacancy Rate (column 4) and Total January 1988 Housing Units (column 1) from the quotient of Ideal Vacancy Rate (Column 3) and Total January 1988 Housing Units (Column 1). For jurisdictions marked “V”, this need is set at zero, rather than a negative value. These jurisdictions have DOF unoccupied unit rates exceeding 10% and are considered to be “vacation” areas with a significant number of “second” homes. Non-vacation home localities should seek a readjustment of their vacant unit need so that the appropriate negative value can be applied and future housing unit needs lowered.
- Step 9:** “Additional Vacancy Need” (column 6): This is the additional number of units that would have to be provided to maintain ideal vacancy rates as a jurisdiction

grew. It is determined by multiplying the Growth 7/89-7/94 by the jurisdiction's ideal vacancy rate.

Step 10: "Total Vacancy Adjustment" (column 7): This is the total number of units that would have to be added (or credited against other demand) to attain and maintain ideal vacancy rates. It is the sum of Existing Vacancy Need (column 5) and Additional Vacancy Need (column 6).

**TABLES 36 through 42 (Revised Demolition Adjustment):**

Step 11: "1984-86 Actual Demolitions": Were obtained from Construction Industry Research Board - Census Data.

Step 12: "Demolition Adjustment": This is 1 2/3 times the Actual Demolition.

The results of the foregoing three sets of tables compose the RHNA Future Needs Factors in Table 14 through 20.

**Avoidance of Impaction**

The income levels for which Future Need additional units are provided are distributed in each jurisdiction on the basis of that jurisdiction's current household income distribution and then adjusted for "avoidance of impaction".

The "avoidance of impaction" adjustment is done in response to the intent of the State Housing Law to avoid further concentration of lower income households in jurisdictions that already have more than the regional average proportion of lower income households. How this is accomplished is a matter of policy choice for SCAG.

The Subcommittee held extensive discussions on this topic over several months. Many approaches were tested by staff and considered by the Subcommittee. The aim was to be fair to all jurisdictions and provide for uniform application of whatever adjustments were decided on.

It was finally decided that all jurisdictions would be adjusted as follows:

That the percentage of lower income households in the Future Need

would be "25% of the way" from their current percentage in a jurisdiction to the regional average of 40.2%. In other words, a jurisdiction with 30% lower income households would have a Future Need that was 32-1/2% lower income, or "25% of the way" from 30% to 40.2%, while one with 50% would have a Future Need that was 47-1/2% lower income, or "25% of the way" from 50% to 40.2%.

After doing this adjustment, a second adjustment would be done for those jurisdictions that were "highly impacted" and would remain so even after 20 years of reduced impactation ("25% of the way") future development. This second adjustment was as follows:

The percentage of lower income Future Need units would be further reduced to a level that would result in the highly impacted jurisdiction no longer being highly impacted in 20 years, unless such a further adjustment would mean that Future Need lower income proportion would be less than two-thirds of its current proportion.

"Highly Impacted" is defined as exceeding the regional average proportion of lower income households by more than 10%. Therefore, this second adjustment would result in such jurisdictions attaining an overall (existing and additional) proportion within 10% of 40.2% lower income, or about 44% lower income, within 20 years. Only if such an adjustment required a reduction in Future Need proportions to less than 2/3rds of its current lower income proportions, would the goal be unattainable. An example of this would be a jurisdiction with 57% current lower income households that required a Future Need lower income proportion of less than 38% to attain an overall proportion of 44% in 20 years. In such a case, the "circuit breaker" would come into play and its Future Need proportion would be reduced to 38% and no further.



TABLE 22  
REVISED RHNA HOUSEHOLD GROWTH  
LOS ANGELES COUNTY

JURISDICTION	TOTAL JAN 1988 (DOF)	HOUSEHOLDS JULY 1994 (GMA-4M)	HOUSEHOLD GROWTH 7/89-7/94
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AGOURA HILLS	6,039	8,189	1,654
ALHAMBRA	27,841	29,337	1,151
ARCADIA-R	18,556	19,390	500
ARTESIA	4,417	4,544	98
AVALON	1,082	1,328	189
AZUSA	12,374	13,805	1,101
BALDWIN PARK-R	16,236	17,455	358
BELL	8,755	8,787	25
BELLFLOWER	23,151	25,319	1,668
BELL GARDENS	9,210	9,234	18
BEVERLY HILLS	15,360	15,971	470
BRADBURY	296	320	18
BURBANK	38,558	41,385	2,175
CARSON	23,831	25,865	1,565
CERRITOS	15,233	16,852	1,245
CLAREMONT	10,775	11,644	668
COMMERCE-R	3,172	3,392	0
COMPTON	23,195	24,922	1,328
COVINA-R	15,710	17,534	743
CUDAHY	5,357	5,542	142
CULVER CITY	16,556	17,546	762
DOWNEY	33,472	34,778	1,005
DUARTE	6,646	7,674	791
EL MONTE	26,408	28,393	1,527
EL SEGUNDO	6,795	7,892	844
GARDENA	18,200	19,882	1,294
GLENDALE	64,312	69,574	4,048
GLENDORA	15,789	17,063	980
HAWAIIAN GARDENS	3,343	3,820	367
HAWTHORNE	26,713	29,921	2,468
HERMOSA BEACH-R	9,578	10,209	161
HIDDEN HILLS	510	565	42
HUNTINGTON PARK	14,477	14,658	139
INDUSTRY	84	196	86
INGLEWOOD	37,045	37,962	705
IRWINDALE	238	258	15
LA CANADA FLNTRG	6,853	7,111	198
LA HABRA HEIGHTS	1,624	1,745	93
LAKEWOOD	26,340	27,313	748
LA MIRADA	12,447	13,477	792



TABLE 22			
REVISED RHNA HOUSEHOLD GROWTH			
LOS ANGELES COUNTY			
JURISDICTION	TOTAL JAN 1988 (DOF)	HOUSEHOLDS JULY 1994 (GMA-4M)	HOUSEHOLD GROWTH 7/89-7/94
LANCASTER	28,036	42,310	10,980
LA PUENTE	8,740	9,063	248
LA VERNE	9,890	11,001	855
LAWDALE	9,020	10,032	778
LOMITA	8,144	8,687	418
LONG BEACH	163,432	175,755	9,479
LOS ANGELES	1,222,354	1,329,605	82,501
LYNWOOD	14,097	14,390	225
MANHATTAN B.-R	14,383	15,658	645
MAYWOOD	6,533	6,587	42
MONROVIA	12,822	13,751	715
MONTEBELLO	18,268	18,650	294
MONTEREY PARK-R	19,227	20,298	483
NORWALK	25,827	27,112	988
PALMDALE	14,443	27,518	10,058
PALOS VERDES EST	5,000	5,362	278
PARAMOUNT	12,351	13,708	1,044
PASADENA	49,115	51,688	1,979
PICO RIVERA-R	15,641	16,829	370
POMONA-R	35,836	39,207	1,972
RANCHO P.V.-R	15,002	15,975	430
REDONDO BEACH-R	27,383	30,458	1,825
ROLLING HILLS	646	678	25
ROLLING H. ES.-R	2,657	2,906	22
ROSEMEAD	13,684	14,203	399
SAN DIMAS	10,230	11,728	1,152
SAN FERNANDO	5,671	5,957	220
SAN GABRIEL	11,941	12,710	592
SAN MARINO	4,415	4,418	2
SANTA FE SPRINGS	4,432	4,692	200
SANTA MONICA	45,741	47,480	1,338
SIERRA MADRE	4,679	4,820	108
SIGNAL HILL-R	3,376	4,296	354
SOUTH EL MONTE	4,676	5,014	260
SOUTH GATE	22,871	22,986	88
SOUTH PASADENA	10,259	10,501	186
SANTA CLARITA-N	34,697	42,203	5,774
TEMPLE CITY	11,210	11,576	282
TORRANCE	52,023	55,480	2,659
VERNON-R	26	73	0
WALNUT	6,443	8,223	1,369
WEST COVINA-R	29,711	31,816	941
WEST HOLLYWOOD	22,561	22,829	206
WESTLAKE VILLAGE	2,476	3,059	448
WHITTIER	27,118	28,132	780
UNINCORPORATED	289,318	327,887	29,668
TOTAL IN COUNTY	2,962,983	3,238,163	205,864

TABLE 23			
REVISED RHNA HOUSEHOLD GROWTH			
JURISDICTION	ORANGE COUNTY		HOUSEHOLD GROWTH 7/89-7/94
	TOTAL JAN 1988 (DOF)	HOUSEHOLDS JULY 1994 (GMA-4M)	
ANAHEIM	88,003	95,971	6,129
BREA	12,003	13,786	1,372
BUENA PARK - R	22,749	24,054	756
COSTA MESA - R	36,909	42,540	3,467
CYPRESS	13,718	14,448	562
FOUNTAIN VALLEY	17,315	18,166	655
FULLERTON	40,591	41,905	1,011
GARDEN GROVE	45,113	47,435	1,786
HUNTINGTON BEACH	68,395	75,363	5,360
IRVINE - R	36,398	54,133	12,673
LA HABRA	17,911	18,909	768
LA PALMA	4,821	4,907	66
LAGUNA BEACH	11,329	12,011	525
LOS ALAMITOS	4,286	4,632	266
NEWPORT BEACH-R	31,415	34,711	1,774
ORANGE	36,197	40,168	3,055
PLACENTIA	12,976	14,927	1,501
SAN CLEMENTE-R	15,874	20,699	2,927
MISSION VIEJO-N	17,148	22,937	4,453
SAN JUAN CAP	8,611	10,773	1,663
SANTA ANA	70,255	75,729	4,211
SEAL BEACH	13,985	14,336	270
STANTON	10,275	11,165	685
TUSTIN - R	18,194	21,202	1,751
VILLA PARK	1,867	1,877	8
WESTMINSTER	25,117	26,384	975
YORBA LINDA	14,436	20,436	4,615
UNINC. COUNTY-R	106,098	125,953	21,258
DANA POINT - N			2,412
COUNTY TOTAL - R	801,989	909,557	86,951

TABLE 24  
REVISED RHNA HOUSEHOLD GROWTH  
RIVERSIDE COUNTY

JURISDICTION	TOTAL JAN 1988 (DOF)	HOUSEHOLDS JULY 1994 (GMA-4M)	HOUSEHOLD GROWTH 7/89-7/94
BANNING-R	6,634	7,788	3,383
BEAUMONT	3,056	3,597	416
BLYTHE	2,540	2,705	127
CATHEDRAL CITY	9,457	16,294	5,259
COACHELLA	3,130	3,817	528
CORONA	16,654	20,879	3,250
DESERT HOT SPGS	4,195	6,228	1,564
HEMET	15,693	19,820	3,175
INDIAN WELLS	1,056	1,446	300
INDIO	10,365	13,974	2,776
LA QUINTA	3,102	4,707	1,235
LAKE ELSINORE	4,705	6,740	1,565
MORENO VALLEY	27,878	50,511	17,410
NORCO	5,651	6,295	495
PALM DESERT	7,843	10,301	1,891
PALM SPRINGS	14,365	17,929	2,742
PERRIS - R	4,150	6,541	7,228
RANCHO MIRAGE	3,895	4,703	622
RIVERSIDE	71,920	83,269	8,730
SAN JACINTO	5,221	8,150	2,253
UNINCORPORATED	114,191	152,506	29,473
TOTAL IN COUNTY	335,701	448,200	94,422

TABLE 25			
REVISED RHNA HOUSEHOLD GROWTH			
JURISDICTION	SAN BERNARDINO COUNTY		
	TOTAL JAN 1988 (DOF)	HOUSEHOLDS JULY 1994 (GMA-4M)	HOUSEHOLD GROWTH 7/89-7/94
ADELANTO	1,978	2,827	653
BARSTOW	7,530	8,534	772
BIG BEAR LAKE	2,370	3,309	722
CHINO	14,376	17,576	2,462
COLTON	11,956	16,403	3,421
FONTANA	23,183	31,645	6,509
GRAND TERRACE	3,545	4,401	658
LOMA LINDA	5,061	6,170	853
MONTCLAIR	8,233	8,988	581
NEEDLES	1,989	2,337	268
ONTARIO	39,479	48,120	6,647
RANCHO CUCAMONGA	29,844	41,618	9,057
REDLANDS	20,870	26,105	4,027
RIALTO	19,665	26,655	5,377
SAN BERNARDINO	54,473	65,962	8,838
UPLAND	22,783	27,290	3,467
VICTORVILLE	10,118	14,800	3,602
HESPERIA - N	8,225	10,833	2,006
HIGHLAND - N	7,753	9,725	1,517
TWENTY-NINE P.-N	3,853	5,075	940
UNINCORPORATED	130,517	169,926	30,315
COUNTY TOTAL	427,801	548,299	92,691

TABLE 26			
REVISED RHNA HOUSEHOLD GROWTH			
VENTURA COUNTY			
JURISDICTION	TOTAL JAN 1988 (DOF)	HOUSEHOLDS JULY 1994 (GMA-4M)	HOUSEHOLD GROWTH 7/89-7/94
CAMARILLO	17,318	20,696	2,598
FILLMORE	3,341	3,691	269
MOORPARK - R	6,688	10,992	2,750
OJAI - R	2,900	3,151	112
OXNARD	38,134	42,477	3,341
PORT HUENEME	6,754	7,456	540
SAN BUENAVENTURA	35,093	39,652	3,507
SANTA PAULA - R	7,717	8,388	487
SIMI VALLEY	29,209	34,581	4,132
THOUSAND OAKS	34,408	40,957	5,038
UNINC. COUNTY-R	27,818	31,860	2,576
TOTAL IN COUNTY	209,380	243,901	25,350



TABLE 27			
REVISED RHNA HOUSEHOLD GROWTH			
JURISDICTION	IMPERIAL COUNTY		
	TOTAL JAN 1988 (DOF)	HOUSEHOLDS JULY 1994 (GMA-4M)	HOUSEHOLD GROWTH 7/89-7/94
BRAWLEY	5,482	5,982	385
CALEXICO	4,518	5,369	655
CALIPATRIA	719	779	46
EL CENTRO	9,139	10,662	1,172
HOLTVILLE	1,414	1,534	92
IMPERIAL	1,281	1,553	209
WESTMORELAND	528	571	33
UNINCORPORATED	9,109	10,451	1,032
COUNTY TOTAL	32,190	36,901	3,624

TABLE 28			
REVISED RHNA HOUSEHOLD GROWTH			
COUNTY	COUNTY SUMMARY		
	TOTAL JAN 1988 (DOF)	HOUSEHOLDS JULY 1994 (GMA-4M)	HOUSEHOLD GROWTH 7/89-7/94
LOS ANGELES	2,962,983	3,238,163	205,864
ORANGE	801,989	909,557	86,951
RIVERSIDE	335,701	448,200	94,422
SAN BERNARDINO	427,801	548,299	92,691
VENTURA	209,380	243,901	25,350
IMPERIAL	32,190	36,901	3,624
REGION	4,770,044	5,425,021	508,902

TABLE 29  
REVISED RHNA VACANCY ADJUSTMENT  
LOS ANGELES COUNTY

JURISDICTION	TOTAL HOUSING UNITS 1/88	% SNGL FAM. UNITS	1988 IDEAL VAC. R	1987 ACTUAL VAC. R	EXISTING VAC NEED 1988	ADDTL VAC NEED 89-94	TOTAL VACANCY ADJSTMNT
AGOURA HILLS	6,301	0.834	2.50	3.40	-57	41	-16
ALHAMBRA	29,195	0.478	3.57	1.90	487	41	528
ARCADIA - R	19,180	0.627	3.12	1.90	117	16	133
ARTESIA	4,604	0.756	2.73	0.70	94	3	96
AVALON-V	1,624	0.403	3.79	9.50	0	7	7
AZUSA	12,691	0.473	3.58	2.90	86	39	126
BALDWIN PARK-R	16,636	0.772	2.68	2.60	7	10	17
BELL	9,332	0.428	3.71	1.40	216	1	217
BELLFLOWER	23,724	0.546	3.36	2.20	276	56	332
BELL GARDENS	9,512	0.702	2.89	2.40	47	1	48
BEVERLY HILLS-R	16,252	0.370	3.89	1.50	195	18	213
BRADBURY	320	0.947	2.16	0.90	4	0	4
BURBANK - R	40,138	0.532	3.41	3.20	41	74	115
CARSON	24,098	0.772	2.68	1.40	309	42	351
CERRITOS	15,521	0.913	2.26	0.70	242	28	270
CLAREMONT	11,219	0.831	2.51	1.70	91	17	107
COMMERCE - R	3,255	0.764	2.71	0.50	0	0	0
COMPTON	24,005	0.702	2.89	1.40	359	38	397
COVINA - R	16,030	0.642	3.07	1.60	118	23	141
CUDAHY	5,611	0.454	3.64	2.40	69	5	75
CULVER CITY	17,115	0.469	3.59	0.70	495	27	522
DOWNEY	34,081	0.602	3.19	1.80	475	32	507
DUARTE	6,826	0.699	2.90	0.90	137	23	160
EL MONTE	27,085	0.567	3.30	1.30	541	50	592
EL SEGUNDO - R	7,080	0.473	3.58	1.20	85	30	115
GARDENA	18,712	0.442	3.67	2.60	201	48	248
GLENDALE - R	67,123	0.415	3.75	2.30	489	152	641
GLENDORA	16,240	0.787	2.64	1.80	136	26	162
HAWAIIAN GARDENS	3,521	0.583	3.25	1.50	62	12	74
HAWTHORNE	27,763	0.337	3.99	1.70	636	98	734
HERMOSA BEACH-R	10,075	0.484	3.55	1.60	98	6	104
HIDDEN HILLS	526	0.958	2.13	2.00	1	1	2
HUNTINGTON PARK	15,384	0.359	3.92	1.70	342	5	347
INDUSTRY	88	0.807	2.58	1.60	1	2	3
INGLEWOOD	38,501	0.405	3.78	3.50	109	27	136
IRWINDALE-V	272	0.971	2.09	2.60	0	0	0
LA CANADA FL.-R	6,971	0.931	2.21	0.60	56	4	60
LA HABRA HGTS-R	1,690	0.956	2.13	1.00	10	2	12
LAKEWOOD	26,586	0.855	2.43	1.00	381	18	399
LA MIRADA	12,866	0.837	2.49	0.60	243	20	263

TABLE 29  
REVISED RHNA VACANCY ADJUSTMENT  
LOS ANGELES COUNTY

JURISDICTION	TOTAL HOUSING UNITS 1/88	% SNGL FAM. UNITS	1988 IDEAL VAC. R	1987 ACTUAL VAC. R	EXISTING VAC NEED 1988	ADDTL VAC NEED 89-94	TOTAL VACANCY ADJSTMNT
LANCASTER	30,306	0.613	3.16	2.00	352	347	699
LA PUENTE	8,966	0.700	2.90	1.40	134	7	142
LA VERNE	10,394	0.687	2.94	2.60	35	25	60
LAWDALE	9,425	0.638	3.08	2.90	17	24	41
LOMITA	8,544	0.537	3.39	1.70	144	14	158
LONG BEACH	172,915	0.449	3.65	2.90	1,300	346	1,646
LOS ANGELES	1,267,726	0.459	3.62	1.20	30,715	2,989	33,704
LYNWOOD	14,578	0.614	3.16	2.50	96	7	103
MANHATTAN B.-R	15,309	0.759	2.72	2.70	2	18	20
MAYWOOD	6,852	0.469	3.59	0.80	191	1	193
MONROVIA	13,387	0.603	3.19	3.30	-14	23	8
MONTEBELLO	18,782	0.582	3.25	0.40	536	10	545
MONTEREY PARK-R	19,936	0.689	2.93	1.20	173	14	187
NORWALK	26,580	0.770	2.69	1.50	316	27	343
PALMDALE - R	16,935	0.617	3.15	6.90	-635	317	-319
PALOS VERDES EST	5,071	0.917	2.25	1.80	23	6	29
PARAMOUNT	12,907	0.565	3.31	2.30	130	35	164
PASADENA	51,135	0.545	3.36	1.80	800	67	866
PICO RIVERA-R	15,948	0.824	2.53	1.10	114	9	123
POMONA - R	37,009	0.652	3.04	3.40	-132	60	-72
RANCHO P.V.-R	15,303	0.817	2.55	1.80	58	11	69
REDONDO B.-R	28,404	0.433	3.70	2.20	214	68	282
ROLLING HILLS	676	0.988	2.04	1.80	2	1	2
ROLLING H. ES.-R	2,726	0.953	2.14	1.80	5	0	5
ROSEMEAD	14,187	0.783	2.65	1.90	107	11	117
SAN DIMAS	10,481	0.760	2.72	1.60	117	31	149
SAN FERNANDO	5,748	0.731	2.81	1.80	58	6	64
SAN GABRIEL	12,415	0.584	3.25	2.40	105	19	124
SAN MARINO - R	4,475	0.987	2.04	0.80	14	0	14
SANTA FE SPRINGS	4,520	0.730	2.81	0.90	86	6	92
SANTA MONICA	47,946	0.232	4.30	0.80	1,679	58	1,737
SIERRA MADRE	4,968	0.743	2.77	2.20	28	3	31
SIGNAL HILL - R	3,586	0.377	3.87	2.80	19	14	33
SOUTH EL MONTE	4,821	0.721	2.84	0.80	98	7	106
SOUTH GATE	23,636	0.593	3.22	1.20	478	3	481
SOUTH PASADENA	10,714	0.502	3.49	2.10	149	7	156
SANTA CLARITA-N	35,047	0.737	2.79	1.00	313	161	475
TEMPLE CITY	11,524	0.857	2.43	2.00	50	7	56
TORRANCE	52,898	0.569	3.29	0.90	1,266	88	1,353
VERNON-R	37	0.784	2.65	1.20	0	0	0
WALNUT	6,604	0.959	2.12	2.20	-5	29	24
WEST COVINA-R	31,063	0.732	2.80	1.90	140	26	166
WEST HOLLYWOOD	24,614	0.122	4.63	1.10	435	10	445
WESTLAKE VILLAGE	2,584	0.767	2.70	2.50	5	12	17
WHITTIER	28,023	0.699	2.90	0.80	589	23	612
UNINCORPORATED	305,164	0.723	2.83	1.40	2,184	840	3,024
TOTAL IN COUNTY	3,082,622	0.543	3.37	1.80	49,690	6,829	56,518

TABLE 30  
REVISED RHNA VACANCY ADJUSTMENT  
ORANGE COUNTY

JURISDICTION	TOTAL HOUSING UNITS 1/88	% SNGL FAM. UNITS	1988 IDEAL VAC. R	1987 ACTUAL VAC. R	EXISTING VAC NEED 1988	ADDTL VAC NEED 89-94	TOTAL VACANCY ADJSTMNT
ANAHEIM	89,873	0.499	3.50	1.90	1,441	215	1,655
BREA - R	13,051	0.625	3.13	2.00	74	43	117
BUENA PARK - R	23,177	0.645	3.07	1.30	204	23	227
COSTA MESA - R	37,282	0.470	3.59	2.00	297	124	421
CYPRESS	13,928	0.766	2.70	1.30	195	15	210
FOUNTAIN VALLEY	17,548	0.807	2.58	2.40	31	17	48
FULLERTON - R	42,108	0.594	3.22	1.70	320	33	353
GARDEN GROVE	45,860	0.621	3.14	1.40	797	56	853
HUNTINGTON B. -R	70,179	0.603	3.19	1.60	559	171	730
IRVINE - R	36,953	0.723	2.83	2.00	154	359	513
LA HABRA	18,419	0.570	3.29	2.10	219	25	244
LA PALMA	4,888	0.794	2.62	1.00	79	2	81
LAGUNA BEACH	12,811	0.649	3.05	2.40	84	16	100
LOS ALAMITOS-R	4,365	0.558	3.33	1.30	44	9	53
NEWPORT BEACH-R	34,336	0.565	3.31	3.70	-136	59	-77
ORANGE	37,125	0.668	3.00	1.50	555	92	647
PLACENTIA - R	13,480	0.697	2.91	2.10	55	44	99
SAN CLEMENTE-R	16,916	0.590	3.23	1.10	180	95	275
MISSION VIEJO-N	17,642	0.604	3.19	2.80	34	142	176
SAN JUAN CAP	9,534	0.717	2.85	1.70	110	47	157
SANTA ANA	72,629	0.524	3.43	2.60	601	144	746
SEAL BEACH	14,486	0.424	3.73	3.40	48	10	58
STANTON	10,437	0.424	3.73	1.80	201	26	227
TUSTIN - R	18,992	0.343	3.97	1.90	197	70	267
VILLA PARK	1,889	0.988	2.04	1.30	14	0	14
WESTMINSTER-R	25,836	0.636	3.09	1.40	219	30	249
YORBA LINDA	15,170	0.924	2.23	2.50	-41	103	62
UNINC. COUNTY-R	110,492	0.666	3.00	2.40	333	638	888
DANA POINT - N							83
COUNTY TOTAL - R	829,406	0.604	3.19	2.10	6,868	2,606	9,474



TABLE 31  
REVISED RHNA VACANCY ADJUSTMENT  
RIVERSIDE COUNTY

JURISDICTION	TOTAL HOUSING UNITS 1/88	% SNGL FAM. UNITS	1988 IDEAL VAC. R	1987 ACTUAL VAC. R	EXISTING VAC NEED 1988	ADDTL VAC NEED 89-94	TOTAL VACANCY ADJSTMNT
BANNING-V, -R	7,420	0.710	2.87	5.00	0	97	97
BEAUMONT-V	3,398	0.675	2.97	3.20	0	12	12
BLYTHE	2,710	0.733	2.80	2.60	5	4	9
CATHOHL CITY-V	11,954	0.576	3.27	7.30	0	172	172
COACHELLA	3,226	0.614	3.16	0.50	86	17	102
CORONA	18,229	0.679	2.96	2.50	84	96	181
DESERT HOT SP-V	5,136	0.565	3.30	8.60	0	52	52
HEMET-V	17,573	0.503	3.49	6.20	0	111	111
INDIAN WELLS-V	3,061	0.696	2.91	5.60	0	9	9
INDIO-V	12,792	0.427	3.72	5.80	0	103	103
LA QUINTA-V	4,486	0.888	2.34	10.60	0	29	29
LAKE ELSINORE-V	5,928	0.562	3.31	4.00	0	52	52
MORENO VALLEY	29,345	0.855	2.43	2.80	-107	424	316
NORCO	5,831	0.958	2.13	5.90	-220	11	-210
PALM DESERT-V	15,320	0.708	2.88	5.60	0	54	54
PALM SPRINGS-V	28,663	0.500	3.50	9.60	0	96	96
PERRIS-R	4,740	0.547	3.36	3.10	6	243	249
RANCHO MIRAGE-V	9,014	0.783	2.65	5.50	0	16	16
RIVERSIDE	75,176	0.663	3.01	4.50	-1,120	263	-857
SAN JACINTO	5,758	0.488	3.54	2.80	42	80	122
UNINC. - V	140,410	0.620	3.14	4.70	0	925	925
TOTAL IN COUNTY	410,170	0.640	3.08	5.30	-1,223	2,865	1,642

TABLE 32  
REVISED RHNA VACANCY ADJUSTMENT

SAN BERNARDINO COUNTY							
JURISDICTION	TOTAL HOUSING UNITS 1/88	% SNGL FAM. UNITS	1988 IDEAL VAC. R	1987 ACTUAL VAC. R	EXISTING VAC NEED 1988	ADDTL VAC NEED 89-94	TOTAL VACANCY ADJSTMNT
ADELANTO-V	2,391	0.356	3.93	9.40	0	26	26
BARSTOW	8,020	0.633	3.10	2.20	72	24	96
BIG BEAR LAKE-V	8,062	0.837	2.49	3.00	0	18	18
CHINO	15,213	0.728	2.82	4.10	-195	69	-126
COLTON	13,127	0.570	3.29	5.10	-238	113	-125
FONTANA	25,132	0.706	2.88	3.50	-155	188	33
GRAND TERRACE	3,779	0.786	2.64	5.31	-101	17	-83
LOMA LINDA-V	5,883	0.593	3.22	4.40	0	27	27
MONTCLAIR	8,841	0.645	3.07	2.50	50	18	68
NEEDLES	2,175	0.634	3.10	2.50	13	8	21
ONTARIO	40,315	0.633	3.10	4.50	-565	206	-359
RANCHO CUCAMONGA	31,665	0.742	2.77	2.00	245	251	496
REDLANDS	22,347	0.674	2.98	4.00	-229	120	-109
RIALTO	20,959	0.770	2.69	4.10	-295	145	-151
SAN BERNARDINO	58,571	0.614	3.16	5.70	-1,489	279	-1,210
UPLAND	24,455	0.636	3.09	2.90	47	107	154
VICTORVILLE	10,661	0.594	3.22	5.10	-201	116	-85
HESPERIA - N	8,676	0.834	2.50	5.20	-234	50	-184
HIGHLAND - N	8,178	0.686	2.94	5.20	-185	45	-140
TWENTY-NINE P.-N	4,152	0.837	2.49	7.20	-196	23	-172
UNINC. - V	181,381	0.775	2.68	4.20	0	811	811
COUNTY TOTAL	503,983	0.711	2.87	4.30	-3,655	2,661	-993

TABLE 33  
REVISED RHNA VACANCY ADJUSTMENT

JURISDICTION	VENTURA COUNTY						
	TOTAL HOUSING UNITS 1/88	% SNGL FAM. UNITS	1988 IDEAL VAC. R	1987 ACTUAL VAC. R	EXISTING VAC NEED 1988	ADDTL VAC NEED 89-94	TOTAL VACANCY ADJSTMNT
CAMARILLO	17,758	0.780	2.66	1.40	224	69	293
FILLMORE	3,445	0.742	2.77	1.70	37	7	44
MOORPARK - R	6,835	0.806	2.58	3.80	-83	71	-12
OJAI - R	2,998	0.766	2.70	1.50	18	3	21
OXNARD	39,929	0.585	3.24	1.10	856	108	965
PORT HUENEME	7,520	0.571	3.29	2.20	82	18	99
SAN BUENAVENTURA	36,240	0.614	3.16	1.90	456	111	566
SANTA PAULA-R	7,994	0.630	3.11	1.10	81	15	96
SIMI VALLEY	30,815	0.820	2.54	0.90	505	105	610
THOUSAND OAKS	35,826	0.781	2.66	1.60	378	134	512
UNINC. COUNTY-R	28,661	0.822	2.54	1.50	149	65	214
TOTAL IN COUNTY	218,021	0.715	2.85	1.50	2,702	707	3,409

TABLE 34  
REVISED RHNA VACANCY ADJUSTMENT

JURISDICTION	IMPERIAL COUNTY		1988 IDEAL VAC. R	1987 ACTUAL VAC. R	EXISTING VAC NEED 1988	ADDTL VAC NEED 89-94	TOTAL VACANCY ADJSTMNT
	TOTAL HOUSING UNITS 1/88	% SNGL FAM. UNITS					
BRAWLEY	5,810	0.653	3.04	4.30	-73	12	-61
CALEXICO	4,579	0.640	3.08	1.40	77	20	97
CALIPATRIA-V	801	0.770	2.69	3.20	0	1	1
EL CENTRO	9,620	0.617	3.15	5.30	-207	37	-170
HOLTVILLE	1,497	0.662	3.01	4.00	-15	3	-12
IMPERIAL	1,301	0.736	2.79	3.50	-9	6	-3
WESTMORELAND-V	604	0.748	2.75	3.90	0	1	1
UNINCORPORATED	11,518	0.526	3.42	3.10	37	35	72
COUNTY TOTAL	35,730	0.608	3.17	3.80	-190	115	-75

TABLE 35  
REVISED RHNA VACANCY ADJUSTMENT

COUNTY SUMMARY							
JURISDICTION	TOTAL HOUSING UNITS 1/88	% SNGL FAM. UNITS	1988 IDEAL VAC. R	1987 ACTUAL VAC. R	EXISTING VAC NEED 1988	ADDTL VAC NEED 89-94	TOTAL VACANCY ADJSTMNT
LOS ANGELES	3,082,622	0.543	3.37	1.80	49,690	6,829	56,518
ORANGE	829,406	0.604	3.19	2.10	6,868	2,606	9,474
RIVERSIDE	410,170	0.640	3.08	5.30	-1,223	2,865	1,642
SAN BERNARDINO	503,983	0.711	2.87	4.30	-3,655	2,661	-993
VENTURA	218,021	0.715	2.85	1.50	2,702	707	3,409
IMPERIAL	35,730	0.608	3.17	3.80	-190	115	-75
REGION	5,079,932			2.31	54,192	15,783	69,974



TABLE 36  
REVISED RHNA DEMOLITION ADJUSTMENT  
LOS ANGELES COUNTY  
1984-86

JURISDICTION	ACTUAL DEMOLITIONS	DEMOLITION ADJUSTMENT
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AGOURA HILLS	7	12
ALHAMBRA	253	422
ARCADIA	103	172
ARTESIA	37	62
AVALON	13	22
AZUSA	185	308
BALDWIN PARK	151	252
BELL	44	73
BELLFLOWER	145	242
BELL GARDENS	37	62
BEVERLY HILLS-R	168	152
BRADBURY	3	5
BURBANK - R	880	680
CARSON	40	67
CERRITOS	15	25
CLAREMONT	15	25
COMMERCE - R	44	86
COMPTON	389	648
COVINA	55	92
CUDAHY	30	50
CULVER CITY	17	28
DOWNEY	116	193
DUARTE	27	45
EL MONTE	98	163
EL SEGUNDO	92	153
GARDENA	158	263
GLENDALE - R	1,159	912
GLENDORA	51	85
HAWAIIAN GARDENS	47	78
HAWTHORNE	1,065	1,775
HERMOSA BEACH	149	248
HIDDEN HILLS	1	2
HUNTINGTON PARK	441	735
INDUSTRY	3	5
INGLEWOOD	406	677
IRWINDALE	11	18
LA CANADA FLNTRG	5	8
LA HABRA HEIGHTS	3	5
LAKEWOOD	15	25
LA MIRADA	2	3

TABLE 36 REVISED RHNA DEMOLITION ADJUSTMENT LOS ANGELES COUNTY 1984-86		
JURISDICTION	ACTUAL DEMOLITIONS	DEMOLITION ADJUSTMENT
LANCASTER	34	57
LA PUENTE	26	43
LA VERNE	9	15
LAWDALE	124	207
LOMITA	51	85
LONG BEACH	754	1,257
LOS ANGELES	7,737	12,895
LYNWOOD	75	125
MANHATTAN BEACH	254	423
MAYWOOD	35	58
MONROVIA	123	205
MONTEBELLO	67	112
MONTEREY PARK	138	230
NORWALK	42	70
PALMDALE	13	22
PALOS VERDES EST	3	5
PARAMOUNT	107	178
PASADENA	326	543
PICO RIVERA	61	102
POMONA	118	197
RANCHO P. VERDES	2	3
REDONDO BEACH	554	923
ROLLING HILLS	8	13
ROLLING HILLS ES	2	3
ROSEMEAD	154	257
SAN DIMAS	0	0
SAN FERNANDO	14	23
SAN GABRIEL	99	165
SAN MARINO	1	2
SANTA FE SPRINGS	7	12
SANTA MONICA	86	143
SIERRA MADRE	20	33
SIGNAL HILL	19	32
SOUTH EL MONTE	52	87
SOUTH GATE	198	330
SOUTH PASADENA	30	50
SANTA CLARITA-N		152
TEMPLE CITY	39	65
TORRANCE	94	157
VERNON-R	23	0
WALNUT	6	10
WEST COVINA-R	26	43
WEST HOLLYWOOD	10	17
WESTLAKE VILLAGE	1	2
WHITTIER	118	197
UNINCORPORATED	795	1,173
TOTAL IN COUNTY	18,935	29,599

TABLE 37		
REVISED RHNA DEMOLITION ADJUSTMENT		
ORANGE COUNTY		
1984-86		
JURISDICTION	ACTUAL DEMOLITIONS	DEMOLITION ADJUSTMENT
ANAHEIM	275	458
BREA	67	112
BUENA PARK	47	78
COSTA MESA	45	75
CYPRESS	12	20
FOUNTAIN VALLEY	3	5
FULLERTON	44	73
GARDEN GROVE	160	267
HUNTINGTON BEACH	83	138
IRVINE	1	2
LA HABRA	42	70
LA PALMA	0	0
LAGUNA BEACH	33	55
LOS ALAMITOS	48	80
NEWPORT BEACH	219	365
ORANGE	93	155
PLACENTIA	11	18
SAN CLEMENTE	21	35
MISSION VIEJO-N		14
SAN JUAN CAP	2	3
SANTA ANA	585	975
SEAL BEACH	38	63
STANTON	24	40
TUSTIN	40	67
VILLA PARK	1	2
WESTMINSTER	49	82
YORBA LINDA	23	38
UNINCORP. -R	141	82
DANA POINT-N		9
COUNTY TOTAL	2,107	3,382

TABLE 38  
 REVISED RHNA DEMOLITION ADJUSTMENT  
 RIVERSIDE COUNTY  
 1984-86

JURISDICTION	ACTUAL DEMOLITIONS	DEMOLITION ADJUSTMENT
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BANNING	21	35
BEAUMONT	9	15
BLYTHE	48	80
CATHEDRAL CITY	0	0
COACHELLA	7	12
CORONA	46	77
DESERT HOT SPGS	4	7
HEMET	20	33
INDIAN WELLS	1	2
INDIO	12	20
LA QUINTA	0	0
LAKE ELSINORE	7	12
MORENO VALLEY	9	15
NORCO	0	0
PALM DESERT	11	18
PALM SPRINGS	4	7
PERRIS	19	32
RANCHO MIRAGE	24	40
RIVERSIDE	204	340
SAN JACINTO	14	23
UNINC. - V	150	250
TOTAL COUNTY	610	1,017

TABLE 39  
REVISED RHNA DEMOLITION ADJUSTMENT  
SAN BERNARDINO COUNTY  
1984-86

JURISDICTION	ACTUAL DEMOLITIONS	DEMOLITION ADJUSTMENT
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ADELANTO	1	2
BARSTOW	5	8
BIG BEAR LAKE	27	45
CHINO	67	112
COLTON	18	30
FONTANA	59	98
GRAND TERRACE	0	0
LOMA LINDA	1	2
MONTCLAIR	4	7
NEEDLES	5	8
ONTARIO	58	97
RANCHO CUCAMONGA	9	15
REDLANDS	38	63
RIALTO	20	33
SAN BERNARDINO	236	393
UPLAND	12	20
VICTORVILLE	15	25
HESPERIA - N	0	0
HIGHLAND - N	0	0
TWENTY-NINE P.-N	0	0
UNINCORPORATED	0	0
COUNTY TOTAL	575	958

TABLE 40		
REVISED RHNA DEMOLITION ADJUSTMENT		
VENTURA COUNTY		
1984-86		
JURISDICTION	ACTUAL DEMOLITIONS	DEMOLITION ADJUSTMENT
CAMARILLO	19	32
FILLMORE	15	25
MOORPARK	3	5
OJAI	5	8
OXNARD	29	48
PORT HUENEME	3	5
SAN BUENAVENTURA	26	43
SANTA PAULA	22	37
SIMI VALLEY	23	38
THOUSAND OAKS	25	42
UNINCORPORATED	53	88
COUNTY TOTAL	223	372



TABLE 41  
REVISED RHNA DEMOLITION ADJUSTMENT  
IMPERIAL COUNTY

JURISDICTION	DEMOLITION ADJUSTMENT
BRAWLEY	14
CALEXICO	12
CALIPATRIA	2
EL CENTRO	24
HOLTVILLE	4
IMPERIAL	3
WESTMORELAND	1
UNINCORPORATED	24
COUNTY TOTAL	83

TABLE 42		
REVISED RHNA DEMOLITION ADJUSTMENT		
COUNTY SUMMARY		
1984-86		
COUNTY	ACTUAL DEMOLITIONS	DEMOLITION ADJUSTMENT
LOS ANGELES	18,935	29,599
ORANGE	2,107	3,382
RIVERSIDE	610	1,017
SAN BERNARDINO	575	958
VENTURA	223	372
IMPERIAL		83
REGION	22,450	35,411



C

LEGAL ISSUES  
DEALT WITH  
IN DEVISING  
METHODOLOGY



## Appendix C

### LEGAL ISSUES DEALT WITH IN DEVISING METHODOLOGY

The RHNA Subcommittee was confronted with several legal issues in the course of its review of the methodology being used to determine regional housing needs. (The State Housing Law appears at the end of this Appendix for the convenience of the reader).

The first four issues dealt with by the Subcommittee were as follows:

1. What does the Housing Element law provide and require regarding the use of RHNA allocation numbers by the local jurisdictions?
2. What types of “growth management control” ordinances and measures may be taken into account by SCAG in determining a jurisdiction’s RHNA allocation?
3. How are moratoriums on residential construction other than growth management control ordinances dealt with in the RHNA review process?
4. What issues are appropriate to be considered in the RHNA allocation review process between SCAG and the local jurisdictions?

The following legal opinion on these four issues was presented to the Subcommittee for their review (references to RHAM are to the RHNA):

#### **1. Use of RHNA Allocations by Local Jurisdictions:**

Government Code sec. 65583 describes the contents required in a local Housing Element. The Housing Element is required to include an assessment and inventory of housing needs and resources. (G.C. 65583(a).) This assessment and inventory is required to include a quantification of the local agencies’ existing and projected housing needs, which must include the RHNA allocation figure (65583(a)(1)). In addition, the assessment and inventory must include a statement of quantified objectives relative to the maintenance, improvement and development of housing.

What is significant, however, is that the legislature has recognized that the total housing needs identified by the assessment and inventory



“may exceed available resources and the communities” ability to satisfy this need ....” (65583(1)(b)). Therefore, if a local agency can appropriately show that the housing needs exceed available resources and the community’s plan requirements, the quantified objectives need not be identical with total housing needs identified, which would include the RHNA allocation figures. However, the local jurisdictions will be required to develop a 5-year time frame for establishing the maximum number of housing units that can be constructed or rehabilitated.

Notwithstanding the above remarks, under the provisions of sec. 65583(a)(1), the RHNA allocation numbers must be included by the locality in its assessment of housing needs. At the same time, the agencies’ assessment and inventory of resources and constraints in meeting those needs will condition to what degree the quantified objectives of the locality will agree with or vary from the “starting point” of the RHNA numbers.

## **2. “Growth Management Control” Ordinances and RHNA Allocations**

SCAG is prohibited from considering a certain type of “growth management control” ordinance, policy, or standard as a justification for reducing a locality’s share of regional housing need. This type of ordinance, policy, or standard is one which directly limits by number the issuance of residential permits or which limits for a set period of time the number of buildable lots which may be developed for residential purposes.

The most sensible reading of this subsection is that the RHNA numbers may not reflect the effect of ordinances, policies, or standards which place a numerical limit (e.g., 10, 100, 1000) on the number of housing construction permits which may be issued. Likewise, they may not reflect similar numerical limits on the development of lots for housing.

The above prohibition does not apply to traditional zoning and subdivision regulations which do not “limit by number.” Simply, SCAG is compelled to ignore express numerical limitations on residential development in arriving at our RHNA allocation numbers.

## **3. Other Residential Construction Moratoriums and RHNA Allocations**

The prohibition on the RHNA taking into account numerical limitations on housing permits or development does not extend to other ordinances which place a moratorium on residential construction for a set period of time in order to protect the public health and safety. (Gov. Code sec. 65584(d)(2).)

When an agency has adopted such an ordinance, it may be a justification for determining or reducing a local government's share of the regional housing need. If, however, a local government relies on its moratorium to revise SCAG's determination of local need during the 90-day RHNA review period, the local government must have adopted required findings to support the revision.

#### **4. Issues Involved in the RHNA Review Process**

After SCAG determines the RHNA Allocations for each jurisdiction (sec. 65584(a)), a locality may petition SCAG for a change in this allocation based upon the criteria and within the time limits outlined in sec. 65584(c).

The issues to be considered in this process differ from those outlined in the first issue we discussed above. (See 1. above.) Whether or not a locality's quantified objectives under section 65583(b) are identical to its RHNA Allocation has nothing to do with what those RHNA Allocations are, but rather with what justifications there are for the discrepancy between its needs and objectives in accordance with sec. 65583(a) and (b).

The Review Process contemplated by sec. 65584(c) should therefore not deal with issues relating to the local agencies' determination that it does not have the available resources and ability to satisfy the housing needs identified by its assessment and inventory including the RHNA allocation numbers. That determination is not part of the SCAG review process.

The review process is therefore concerned with issues involving the allocation of need in accordance with the criteria in sec. 65584(a), not with the local capabilities of a jurisdiction to satisfy such need.

The Subcommittee agreed with narrow interpretation of the State Housing Law requirements on Issue No.2, above and agreed that staff should follow it in its work. There was little controversy on the other three issues, and staff followed the legal opinion on each.

After these issues had been dealt with, the State Attorney General issued an Opinion in response to the following three questions concerning the determination of a locality's share of regional housing allocation needs:

1. Must the determination include both the existing and projected housing needs of the locality?

2. Must the availability of suitable housing sites be considered based upon the existing zoning ordinances and land use restrictions of the locality or based upon the potential for increased residential development under alternative zoning ordinances and land use restrictions?
3. Must the income categories of sections 6910-6932 of title 25 of the California Administrative Code be used?

The Opinion, in its entirety, is included below in this Appendix.

The first and third questions presented no real source of controversy for the RHNA effort, since SCAG had already included both existing and projected needs and used the prescribed income categories.

The second question presented a more complex set of factors. Although the Opinion may not seem straightforward in its reasoning or conclusion, it seemed to say that any "circularity" in the RHNA--Housing Element/General Plan--Zoning and Subdivision Ordinance--Next RHNA chain had to be avoided by the RHNA looking beyond just existing land use restrictions and zoning ordinances to other factors.

The issue was resolved by a policy decision to base the Draft RHNA upon the Draft Growth Management Plan "adjusted for impermissible growth control and zoning considerations not consistent with state law." At the time, December, 1987, work on the GMP was proceeding on the basis of a forecast which may have taken some of these impermissible or inconsistent factors into account. As of March, 1988, the GMA-1 alternative distribution had been done on a different basis, obviating the apparent need for staff to adjust for any such considerations.

STATE HOUSING ELEMENT LAW

## Article 10.6. Housing Elements

### Policy

65580. The Legislature finds and declares as follows:

(a) The availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every California family is a priority of the highest order.

(b) The early attainment of this goal requires the cooperative participation of government and the private sector in an effort to expand housing opportunities and accommodate the housing needs of Californians of all economic levels.

(c) The provision of housing affordable to low- and moderate-income households requires the cooperation of all levels of government.

(d) Local and state governments have a responsibility to use the powers vested in them to facilitate the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community.

(e) The Legislature recognizes that in carrying out this responsibility, each local government also has the responsibility to consider economic, environmental, and fiscal factors and community goals set forth in the general plan and to cooperate with other local governments and the state in addressing regional housing needs.

(Added by Stats. 1980, Ch. 1143.)

### Intent

65581. It is the intent of the Legislature in enacting this article:

(a) To assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal.

(b) To assure that counties and cities will prepare and implement housing elements which, along with federal and state programs, will move toward attainment of the state housing goal.

(c) To recognize that each locality is best capable of determining what efforts are required by it to contribute to the attainment of the state housing goal, provided such a determination is compatible with the state housing goal and regional housing needs.

(d) To ensure that each local government cooperates with other local governments in order to address regional housing needs.

(Added by Stats. 1980, Ch. 1143.)

### Definitions

65582. As used in this article:

(a) "Community," "locality," "local government," or "jurisdiction," means a city, city and county, or county.

(b) "Department" means the Department of Housing and Community Development.

(c) "Housing element" or "element" means the housing element of the community's general plan, as required pursuant to this article and subdivision (c) of Section 65302.

(Added by Stats. 1980, Ch. 1143.)



Housing element  
content

65583. The housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, and mobilehomes, and shall make adequate provision for the existing and projected needs of all economic segments of the community. The element shall contain all of the following:

(a) An assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs. The assessment and inventory shall include the following:

(1) Analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected housing needs for all income levels. These existing and projected needs shall include the locality's share of the regional housing need in accordance with Section 65584.

(2) Analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition.

(3) An inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites.

(4) Analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures.

(5) Analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, and the cost of construction.

(6) Analysis of any special housing needs, such as those of the handicapped, elderly, large families, farmworkers, families with female heads of households, and families and persons in need of emergency shelter.



(7) Analysis of opportunities for energy conservation with respect to residential development.

(b) A statement of the community's goals, quantified objectives, and policies relative to the maintenance, improvement, and development of housing.

It is recognized that the total housing needs identified pursuant to subdivision (a) may exceed available resources and the community's ability to satisfy this need within the content of the general plan requirements outlined in Article 5 (commencing with Section 65300). Under these circumstances, the quantified objectives need not be identical to the identified existing housing needs, but should establish the maximum number of housing units that can be constructed, rehabilitated, and conserved over a five-year time frame.

(c) A program which sets forth a five-year schedule of actions the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element through the administration of land use and development controls, provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. In order to make adequate provision for the housing needs of all economic segments of the community, the program shall do all of the following:

(1) Identify adequate sites which will be made available through appropriate zoning and development standards and with public services and facilities needed to facilitate and encourage the development of a variety of types of housing for all income levels, including rental housing, factory-built housing, mobilehomes, emergency shelters and transitional housing in order to meet the community's housing goals as identified in subdivision (b).

(2) Assist in the development of adequate housing to meet the needs of low- and moderate-income households.

(3) Address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing.

(4) Conserve and improve the condition of the existing affordable housing stock.

(5) Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, or color.

The program shall include an identification of the agencies and officials responsible for the implementation of the various actions and the means by which consistency will be achieved with other general plan elements and community goals. The local government shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort.

(Amended by Stats. 1984, Ch. 1691. Urgency; effective October 1, 1984; Amended by Stats. 1986, Ch. 1383.)

Note: Stats. 1984, Ch. 1691, also reads:

#### Uncodified policy

SEC. 1. The Legislature finds and declares that because of economic, physical, and mental conditions that are beyond their control, thousands of individuals and families in California are homeless. Churches, local governments, and nonprofit organizations providing assistance to the homeless have been overwhelmed by a new class of homeless: families with children, individuals with employable skills, and formerly middle-class families and individuals with long work histories.

The programs provided by the state, local, and federal governments, and by private institutions, have been unable to meet existing needs and further action is necessary. The Legislature finds and declares that two levels of housing assistance are needed: an emergency fund to supplement temporary shelter programs, and a fund to facilitate the preservation of existing housing and the creation of new housing units affordable to very low income households. It is in the public interest for the State of California to provide this assistance.

The Legislature further finds and declares that there is a need for more information on the numbers of homeless and the causes of homelessness, and for systematic exploration of more comprehensive solutions to the problem. Both local and state government have a role to play in identifying, understanding, and devising solutions to the problem of homelessness.

#### Uncodified Policy

Note: Stats. 1986, Ch. 1383, also reads:

Sec. 3. The amendments to paragraph (1) of subdivision (c) of Section 65583 of the Government Code made by the act adding this section during the 1986 Regular Session of the Legislature shall require an identification of sites for emergency shelters and transitional housing by January 1, 1988, or by the next periodic review of a housing element pursuant to

Section 65588 of the Government Code, whichever is later, in order to give local governments adequate time to plan for, and to assist in the development of, housing for homeless persons, if it is determined that there is a need for emergency shelter pursuant to paragraph (6) of subdivision (a) of Section 65583 of the Government Code.

#### **Regional housing needs**

65584. (a) For purposes of subdivision (a) of Section 65583, a locality's share of the regional housing needs includes that share of the housing need of persons at all income levels within the area significantly affected by a jurisdiction's general plan. The distribution of regional housing needs shall, based upon available data, take into consideration market demand for housing, employment opportunities, the availability of suitable sites and public facilities, commuting patterns, type and tenure of housing need, and the housing needs of farmworkers. The distribution shall seek to avoid further impaction of localities with relatively high proportions of lower income households. Based upon data provided by the Department of Finance, in consultation with each council of government, the Department of Housing and Community Development shall determine the regional share of the statewide housing need at least two years prior to the second revision, and all subsequent revisions as required pursuant to Section 65588. Based upon data provided by the Department of Housing and Community Development relative to the statewide need for housing, each council of governments shall determine the existing and projected housing need for its region. Within 30 days following notification of this determination, the Department of Housing and Community Development shall ensure that this determination is consistent with the statewide housing need and may revise the determination of the council of governments if necessary to obtain this consistency. Each locality's share shall be determined by the appropriate council of governments consistent with the criteria above with the advice of the department subject to the procedure established pursuant to subdivision (c) at least one year prior to the second revision, and at five-year intervals following the second revision pursuant to Section 65588.

(b) For areas with no council of governments, the Department of Housing and Community Development shall determine housing market areas and define the regional housing need for localities within these areas. Where the



department determines that a local government possesses the capability and resources and has agreed to accept the responsibility, with respect to its jurisdiction, for the identification and determination of housing market areas and regional housing needs, the department shall delegate this responsibility to the local governments within these areas.

(c) Within 90 days following a determination of a council of governments pursuant to subdivision (a), or the department's determination pursuant to subdivision (b), a local government may revise the determination of its share of the regional housing need in accordance with the considerations set forth in subdivision (a). The revised share shall be based upon available data and accepted planning methodology, and supported by adequate documentation. Within 60 days after the time period for the local government's revision, the council of governments or the department, as the case may be, shall accept the revision or shall indicate, based upon available data and accepted planning methodology, why the revision is inconsistent with the regional housing need. The housing element shall contain an analysis of the factors and circumstances, with all supporting data, justifying the revision. All materials and data used to justify any revision shall be made available upon request by any interested party within seven days upon payment of reasonable costs of reproduction unless the costs are waived due to economic hardship.

(d) (1) Except as provided in paragraph (2), any ordinance, policy, or standard of a city, county, or city and county which directly limits, by number, the building permits which may be issued for residential construction, or which limits for a set period of time the number of buildable lots which may be developed for residential purposes, shall not be a justification for a determination or a reduction in a local government's share of the regional housing need.

(2) Paragraph (1) does not apply to any city, county, or city and county which imposes a moratorium on residential construction for a set period of time in order to preserve and protect the public health and safety. If a moratorium is in effect, the city, county, or city and county shall, prior to a revision pursuant to subdivision (c), adopt findings which specifically describe the impacted public facilities and the reasons why construction of

the number of units specified as its share of the regional housing need would prevent the mitigation of that impact.

(e) Any authority to review and revise a local government's share of the regional housing need granted under this section shall not constitute authority to revise, approve, or disapprove the manner in which the local government's share of the regional housing need is implemented through its housing program.

(f) A fee may be charged interested parties for any additional costs caused by the amendments to subdivision (c) at the 1983-84 Regular Session of the Legislature reducing from 45 to seven days the time within which materials and data shall be made available to interested parties.

(g) Determinations made by the department, a council of governments, or a local government pursuant to this section are exempt from the provisions of the California Environmental Quality Act, which is provided for in Division 13 (commencing with Section 21000) of the Public Resources Code.

(Amended by Stats. 1984, Ch. 1684.)

**Housing element  
guidelines and  
state review**

65585. (a) Each local government shall consider the guidelines adopted by the department pursuant to Section 50459 of the Health and Safety Code in the preparation and amendment of its housing element pursuant to this article. Those guidelines shall be advisory to each local government in order to assist it in the preparation of its housing element.

(b) At least 90 days prior to adoption of the housing element, or at least 45 days prior to the adoption of an amendment to this element, the planning agency of a local government shall submit a draft of the element or amendment to the department. The department shall review drafts submitted to it and report its findings to the planning agency within 90 days of receipt of the draft in the case of adoption of the housing element pursuant to this article, or within 45 days of receipt of the draft in the case of an amendment. The legislative body shall consider the department's findings prior to final adoption of the housing element or amendment unless the department's findings are not available within the above prescribed time limits. If the department's findings are not available within those prescribed time limits, the legislative body may take the department's findings into consideration at the time it considers future amendments to the housing element.

(c) Each local government shall provide the department with a copy of its adopted housing element or amendments. The department may review adopted housing elements or amendments and report its findings.

(d) Except as provided in Section 65586, any and all findings made by the department pursuant to subdivisions (b) and (c) shall be advisory to the local government.

(Amended by Stats. 1983, Ch. 1250 [effective January 1, 1984]; Stats. 1984, Ch. 1009.)

#### Deadline for adoption

65586. Local governments shall conform their housing elements to the provisions of this article on or before October 1, 1981. Jurisdictions with housing elements adopted before October 1, 1981, in conformity with the housing element guidelines adopted by the Department of Housing and Community Development on December 7, 1977, and located in Subchapter 3 (commencing with Section 6300) of Chapter 6 of Part 1 of Title 25 of the California Administrative Code [repealed in 1982], shall be deemed in compliance with this article as of its effective date. A locality with a housing element found to be adequate by the department before October 1, 1981, shall be deemed in conformity with these guidelines.

(Added by Stats. 1980, Ch. 1143.)

#### Extension of adoption deadline

65587. (a) Each city, county, or city and county shall bring its housing element, as required by subdivision (c) of Section 65302, into conformity with the requirements of this article on or before October 1, 1981. No extension of time for such purpose may be granted pursuant to Section 65361, notwithstanding its provisions to the contrary.

#### Judicial standard of review

(b) Any action brought by any interested party to review the conformity with the provisions of this article of any housing element or portion thereof or revision thereto shall be brought pursuant to Section 1085 of the Code of Civil Procedure; the court's review of compliance with the provisions of this article shall extend to whether the housing element or portion thereof or revision thereto substantially complies with the requirements of this article.

#### Enforcement of compliance with judicial action

(c) If a court finds that an action of a city, county, or city and county, which is required to be consistent with its general plan, does not comply with its housing element, the city, county, or city and county shall bring its action into compliance within 60 days. However, the court shall retain jurisdiction throughout the period for compliance to enforce its decision.



Upon the court's determination that the 60-day period for compliance would place an undue hardship on the city, county, or city and county, the court may extend the time period for compliance by an additional 60 days.

(Amended by Stats. 1984, Ch. 1009.)

Note: Stats. 1984, Ch. 1009, also reads:

**Uncodified policy**

SEC. 44. It is the intent of the Legislature that the term "substantially complies," as used in subdivision (b) of Section 65587, be given the same interpretation as was given that term by the court in *Camp v. Board of Supervisors*, 123 Cal. App. 3d 334, 348.

**Policy:  
Increasing housing  
opportunities**

65587.1. (a) The Legislature finds and declares that local policies and programs which increase housing opportunities through a tax-exempt revenue bond program or through a requirement that the approval of a housing related project be tied to the provision of assistance for housing are consistent with the intent of this article. The Legislature further finds and declares that actions which have the effect of impeding or halting such policies and programs or the direct production of housing run contrary to the goals of increased housing opportunities and balanced commercial and residential development embodied in this article.

(b) Notwithstanding any other provision of law, neither a mortgage revenue bond program subject to subdivision (b) of Section 52053.5 of the Health and Safety Code nor a local approval, made prior to May 1, 1983, of a housing related project shall be invalidated due to the failure or alleged failure of a city and county to comply with this article, subdivision (c) of Section 65302 of the Government Code, or any regulations or guidelines adopted pursuant thereto, or any other provision of law requiring or claimed to require consistency with the housing element of a local general plan. For purposes of this section, a "housing related project" means (a) a residential project or (b) a nonresidential project, the local approval of which was conditioned upon the nonresidential developer (1) developing or rehabilitating or causing to be developed or rehabilitated housing units, or (2) providing funds for the development or rehabilitation of housing units, or (3) investing in a mortgage revenue bond program subject to subdivision (b) of Section 52053.5 of the Health and Safety Code, under a formula or guidelines adopted by the planning commission or local governing body of the city and county. For purposes of this section, "housing related

project" shall not include a project, the construction or development of which requires either the demolition or conversion of low- or moderate-rental residential units and the local approval of which does not provide for the replacement of such units and for the maintenance in such units of rents affordable to low- and moderate-income persons for a period of not less than 20 years.

(Added by Stats. 1982, Ch. 312. Effective June 28, 1982.)

**Periodic review and  
revision**

65588. (a) Each local government shall review its housing element as frequently as appropriate to evaluate all of the following:

(1) The appropriateness of the housing goals, objectives, and policies in contributing to the attainment of the state housing goal.

(2) The effectiveness of the housing element in attainment of the community's housing goals and objectives.

(3) The progress of the city, county, or city and county in implementation of the housing element.

**Deadlines for  
completing housing  
element revisions**

(b) The housing element shall be revised as appropriate, but not less than every five years, to reflect the results of this periodic review.

In order to facilitate effective review by the department of housing elements, local governments following shall prepare and adopt the first two revisions of their housing elements no later than the dates specified in the following schedule, notwithstanding the date of adoption of the housing elements in existence on the effective date of the act which amended this section during the 1983-84 session of the Legislature.

(1) Local governments within the regional jurisdiction of the Southern California Association of Governments: July 1, 1984, for the first revision and July 1, 1989, for the second revision.

(2) Local governments within the regional jurisdiction of the Association of Bay Area Governments: January 1, 1985, for the first revision, and July 1, 1990, for the second revision.

(3) Local governments within the regional jurisdiction of the San Diego Association of Governments, the Council of Fresno County Governments, the Kern County Council of Governments, the Sacramento Council of Governments, and the Association of Monterey Bay Area Governments: July 1, 1985, for the first revision, and July 1, 1991, for the second revision.

(4) All other local governments: January 1, 1986, for the first revision, and July 1, 1992, for the second revision.

(5) Subsequent revisions shall be completed not less often than at five-year intervals following the second revision.

(c) The review and revision of housing elements required by this section shall take into account any low- or moderate-income housing which has been provided or required pursuant to Section 65590.

(d) The review pursuant to subdivision (c) shall include, but need not be limited to, the following:

(1) The number of new housing units approved for construction within the coastal zone after January 1, 1982.

(2) The number of housing units for persons and families of low or moderate income, as defined in Section 50093 of the Health and Safety Code, required to be provided in new housing developments either within the coastal zone or within three miles of the coastal zone pursuant to Section 65590.

(3) The number of existing residential dwelling units occupied by persons and families of low or moderate income, as defined in Section 50093 of the Health and Safety Code, that have been authorized to be demolished or converted since January 1, 1982, in the coastal zone.

(4) The number of residential dwelling units for persons and families of low or moderate income, as defined in Section 50093 of the Health and Safety Code, that have been required for replacement or authorized to be converted or demolished as identified in paragraph (3). The location of the replacement units, either onsite, elsewhere within the locality's jurisdiction within the coastal zone, or within three miles of the coastal zone within the locality's jurisdiction, shall be designated in the review.

(Amended by Stats. 1984, Ch. 208. Effective June 20, 1984.)

#### Legal effect

65589. (a) Nothing in this article shall require a city, county, or city and county to do any of the following:

(1) Expend local revenues for the construction of housing, housing subsidies, or land acquisition.

(2) Disapprove any residential development which is consistent with the general plan.

(b) Nothing in this article shall be construed to be a grant of authority or a repeal of any authority which may exist of a local government



to impose rent controls or restrictions on the sale of real property.

(c) Nothing in this article shall be construed to be a grant of authority or a repeal of any authority which may exist of a local government with respect to measures that may be undertaken or required by a local government to be undertaken to implement the housing element of the local general plan.

(d) The provisions of this article shall be construed consistent with, and in promotion of, the statewide goal of a sufficient supply of decent housing to meet the needs of all Californians.

(Added by Stats. 1980, Ch. 1143.)

65589.5. When a proposed housing development project complies with the applicable general plan, zoning, and development policies in effect at the time that the housing development project's application is determined to be complete, but the local agency proposes to disapprove the project or to approve it upon the condition that the project be developed at a lower density, the local agency shall base its decision regarding the proposed housing development project upon written findings supported by substantial evidence on the record that both of the following conditions exist:

(a) The housing development project would have a specific, adverse impact upon the public health or safety unless the project is disapproved or approved upon the condition that the project be developed at a lower density.

(b) There is no feasible method to satisfactorily mitigate or avoid the adverse impact identified pursuant to subdivision (a), other than the disapproval of the housing development project or the approval of the project upon the condition that it be developed at a lower density.

(Added by Stats. 1982, Ch. 1438.)

65589.6. In any action taken to challenge the validity of a decision by a city, county, or city and county to disapprove a project or approve a project upon the condition that it be developed at a lower density pursuant to Section 65589.5, the city, county, or city and county shall bear the burden of proof that its decision has conformed to all of the conditions specified in Section 65589.5.

(Added by Stats. 1984, Ch. 1104.)

65589.8. A local government which adopts a requirement in its housing element that a housing development contain a fixed percentage of

Findings to reject  
housing development  
approvals

Action to challenge  
validity of project  
approval/disapproval

Affordable housing

affordable housing units, shall permit a developer to satisfy all or a portion of that requirement by constructing rental housing at affordable monthly rents, as determined by the local government.

Nothing in this section shall be construed to expand or contract the authority of a local government to adopt an ordinance, charter amendment, or policy requiring that any housing development contain a fixed percentage of affordable housing units.

(Added by Stats. 1983, Ch. 787.)

TO BE PUBLISHED IN THE OFFICIAL REPORTS

OFFICE OF THE ATTORNEY GENERAL  
State of California

JOHN K. VAN DE KAMP  
Attorney General

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OPINION	:	
	:	
of	:	
	:	
JOHN K. VAN DE KAMP	:	No. 87-206
Attorney General	:	
	:	
RODNEY O. LILYQUIST	:	<u>SEPTEMBER 29, 1987</u>
Deputy Attorney General	:	

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THE HONORABLE DAVID ROBERTI, MEMBER, CALIFORNIA STATE SENATE, has requested an opinion on the following questions concerning the determination of a locality's share of the regional housing needs by a council of governments:

1. Must the determination include both the existing and projected housing needs of the locality?

2. Must the availability of suitable housing sites be considered based upon the existing zoning ordinances and land use restrictions of the locality or based upon the potential for increased residential development under alternative zoning ordinances and land use restrictions?

3. Must the income categories of sections 6910-6932 of title 25 of the California Administrative Code be used?

CONCLUSIONS

1. The determination of a locality's share of the regional housing needs by a council of governments must include both the existing and projected housing needs of the locality.

2. The availability of suitable housing sites must be considered based not only upon the existing zoning ordinances and land use restrictions of the locality but also based upon the potential for increased residential development under alternative zoning ordinances and land use restrictions.

3. The income categories of sections 6910-6932 of title 25 of the California Administrative Code must be used.



## ANALYSIS

The three questions presented for analysis concern a city's or county's share of regional housing needs as determined by a council of governments and set forth in its general plan. In analyzing these questions we preliminarily note that every city and county operates under a comprehensive and long-term general plan to guide its future physical development. (Gov. Code, § 65300; Buena Vista Garden Apartments Assn. v. City of San Diego Planning Dept. (1985) 175 Cal.App.3d 289, 294.)<sup>1</sup> "The general plan is atop the hierarchy of local government law regulating land use." (Neighborhood Action Group v. County of Calaveras (1984) 156 Cal.App.3d 1176, 1183.) Section 65300 states:

"Each planning agency shall prepare and the legislative body of each county and city shall adopt a comprehensive, long-term general plan for the physical development of the county or city, and of any land outside its boundaries which in the planning agency's judgment bears relation to its planning. Chartered cities shall adopt general plans which contain the mandatory elements specified in Section 65302."

Section 65302 provides:

"The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principles, standards, and plan proposals. The plan shall include the following elements:

" . . . . .

"(c) A housing element as provided in Article 10.6 (commencing with Section 65580).

" . . . . ."

The "housing element as provided in Article 10.6" (§§ 65580-65589.8) must meet detailed requirements. Section 65583 provides:

"The housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for

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1. All section references hereafter to the Government Code are by section number only.

housing, including rental housing, factory-built housing, and mobilehomes, and shall make adequate provision for the existing and projected needs of all economic segments of the community. The element shall contain all of the following:

"(a) An assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs. The assessment and inventory shall include the following:

"(1) Analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected housing needs for all income levels. These existing and projected needs shall include the locality's share of the regional housing need in accordance with Section 65584.

" . . . . ."

Section 65584 states:

"(a) For purposes of subdivision (a) of Section 65583, a locality's share of the regional housing needs includes that share of the housing need of persons at all income levels within the area significantly affected by a jurisdiction's general plan. The distribution of regional housing needs shall, based upon available data, take into consideration market demand for housing, employment opportunities, the availability of suitable sites and public facilities, commuting patterns, type and tenure of housing need, and the housing needs of farmworkers. The distribution shall seek to avoid further impaction of localities with relatively high proportions of lower income households. Based upon data provided by the Department of Finance, in consultation with each council of government, the Department of Housing and Community Development shall determine the regional share of the statewide housing need at least two years prior to the second revision, and all subsequent revisions as required pursuant to Section 65588. Based upon data provided by the Department of Housing and Community Development relative to the statewide need for housing, each council of governments shall determine the existing and projected housing need for its region. Within 30 days following notification of this determination, the Department of Housing and Community Development shall ensure that this determination is consistent with the statewide housing need and may revise the determination of the council of governments if necessary to obtain this consistency. Each locality's share shall be determined by the appropriate

council of governments consistent with the criteria above with the advice of the department subject to the procedure established pursuant to subdivision (c) at least one year prior to the second revision, and at five-year intervals following the second revision pursuant to Section 65588.

"(b) For areas with no council of governments, the Department of Housing and Community Development shall determine housing market areas and define the regional housing need for localities within these areas. Where the department determines that a local government possesses the capability and resources and has agreed to accept the responsibility, with respect to its jurisdiction, for the identification and determination of housing market areas and regional housing needs, the department shall delegate this responsibility to the local governments within these areas.

" . . . . . "

Section 65584 gives the Department of Housing and Community Development ("Department") various responsibilities including the duty to define the regional housing need for localities<sup>2/</sup> in areas not covered by a council of governments, unless it has delegated such authority to a local government. For cities and counties located in areas served by a council of governments, the council performs this function.

Section 65584 requires the Department or a council to act when a housing element of a city or county is revised "pursuant to Section 65588." The latter statute designates various dates for housing element revisions, including for areas covered by specified councils of governments:

"(1) Local governments within the regional jurisdiction of the Southern California Association of Governments: July 1, 1984, for the first revision and July 1, 1989, for the second revision.

"(2) Local governments within the regional jurisdiction of the Association of Bay Area Governments: January 1, 1985, for the first revision, and July 1, 1990, for the second revision.

"(3) Local governments within the regional jurisdiction of the San Diego Association of

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2. Throughout the statutory scheme "locality" is used interchangeably with "community," "local government," and "jurisdiction" and means either the city or the county (or San Francisco which is a city and county). (§ 65582, subd. (a).)

Governments, the Council of Fresno County Governments, the Kern County Council of Governments, the Sacramento Council of Governments, and the Association of Monterey Bay Area Governments: July 1, 1985, for the first revision, and July 1, 1991, for the second revision."

Thereafter a housing element revision is required "not less than every five years." (§ 65588, subd. (b).)

The focus of the three inquiries is directed at both sections 65583 and 65584. Several well-recognized principles of statutory construction aid our analysis of these legislative enactments. In construing statutory language, we are to "ascertain the intent of the Legislature so as to effectuate the purpose of the law." (Select Base Materials v. Board of Equal. (1959) 51 Cal.2d 640, 645; accord People v. Davis (1981) 29 Cal.3d 814, 828.) "In determining such intent, the court 'turns first to the words themselves for the answer' [citations]." (People v. Craft (1986) 41 Cal.3d 554, 560.) The words are to be given "their ordinary and generally accepted meaning." (People v. Castro (1985) 38 Cal.3d 301, 310.) Moreover, "legislation should be construed so as to harmonize its various elements without doing violence to its language or spirit." (Wells v. Marina City Properties, Inc. (1981) 29 Cal.3d 781, 788.) "Wherever reasonable, interpretations which produce internal harmony, avoid redundancy and accord significance to every word and phrase are preferred." (Pacific Legal Foundation v. Unemployment Ins. Appeals Bd. (1981) 29 Cal.3d 101, 114.) "Interpretive constructions which render some words surplusage, defy common sense, or lead to mischief or absurdity, are to be avoided." (California Mfrs. Assn. v. Public Utilities Com. (1979) 24 Cal.3d 836, 844.)

### 1. Existing and Projected Housing Needs

The first question posed is whether the council's determination of a locality's share is to include both the existing and projected<sup>3</sup> housing needs of the locality. We conclude that it does.

Section 65584 directs a council to "determine the existing and projected housing need for its region." The purpose of such determination is to calculate and apportion shares of this need to all cities and counties in the region. "Each locality's share shall be determined by the appropriate council of governments." (§65584, subd. (a).)

Two components thus comprise the regional housing need: the existing housing need and the projected housing need. When

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3. A locality's "projected" housing needs would be those for the next five-year period. (See § 65583, subds. (b), (c).)



shares of the regional housing need are apportioned to the communities in the area, each share contains both components. No provision of the statute remotely suggests that one of the necessary components is to be omitted when apportioning shares.

Such construction of section 65584 is supported by the language of section 65583. As previously quoted, the latter statute requires that the housing element of a city or county contain "a quantification of the locality's existing and projected housing needs for all income levels." It then provides: "These existing and projected needs shall include the locality's share of the regional housing need in accordance with Section 65584." Hence the reference in section 65583 to "existing and projected housing needs" in conjunction with "the locality's share of the regional housing need" clearly indicates that the latter incorporates both components.

One of the purposes of the legislation governing housing elements is "[t]o ensure that each local government cooperates with other local governments in order to address regional housing needs." (§ 65581, subd. (d).) Regional housing needs include both existing and projected needs. (§ 65584, subd. (a).) Both components are "addressed" by apportioning shares thereof to each community in the region. By so construing section 65584, we give each of its provisions meaning and carry out the apparent intent of the Legislature.

In answer to the first question, therefore, we conclude that the determination of a locality's share of the regional housing needs by a council of governments must include both the existing and projected housing needs of the locality.

## 2. Current Zoning Ordinances

The second question concerns whether in making its determination of a locality's share of the regional housing needs, a council of governments is to consider the availability of suitable housing sites based upon the existing zoning ordinances and land use restrictions of the locality or upon alternative zoning ordinances and land use restrictions that would allow the potential for increased residential development. We conclude that both existing and alternative zoning ordinances and land use restrictions must be considered.

The council of governments is directed to determine a locality's share of the regional housing needs based upon the following criteria:

"The market demand for housing, employment opportunities, the availability of suitable sites and public facilities, commuting patterns, type and tenure of housing need, and the housing needs of farmworkers [and the avoidance of] further impaction of localities

with relatively high proportions of lower income households." (§ 65584, subd. (a).)

We find no indication in section 65584 that current zoning ordinances and land use restrictions are to limit the factor of "the availability of suitable sites." A housing site would be unsuitable based upon its physical characteristics, not because of some governmental control of an artificial and external nature. The planning process of sections 65583 and 65584 contemplates an identification of adequate sites that could be made available through different policies and development standards. Existing zoning policies would be only one aspect of the "available data" upon which the factor of "the availability of suitable sites" is to be considered under section 65584. To argue that this part of the general plan is required to conform to existing zoning practices would be anomalous and circuitous, since section 65860 requires the zoning ordinances of a locality to be consistent with its general plan. Subdivision (d) of section 65584 emphasizes this fact by expressly providing that a local government's share of the regional housing need is not subject to reduction, except in one narrow circumstance, by:

" . . . any ordinance, policy, or standard of a city, county, or city and county which directly limits, by number, the building permits which may be issued for residential construction, or which limits for a set period of time the number of buildable lots which may be developed for residential purposes."

Our construction of section 65584 is consistent with the goals of the statutory scheme as a whole (§§ 65580-65589.8) and the particular requirements specified for housing elements (§ 65583). The legislation has as its primary purpose "to expand housing opportunities and accommodate the housing needs of Californians of all economic levels." (§ 65580, subd. (b).) Cities and counties are directed to "recognize their responsibilities in contributing to the attainment of the state housing goal." (§ 65580, subd. (a).) Each local government is "to cooperate with other local governments and the state in addressing regional housing needs." (§ 65580, subd. (e).) Allowing a city or county to prevent being allocated a share of the regional housing needs through restricted zoning ordinances would be contrary to the manifest intent of the Legislature.<sup>4</sup>

The housing element of a local government must specifically include:

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4. The only authorized exception is a locality's "moratorium on residential construction for a set period of time in order to preserve and protect the public health and safety." (§ 65584, subd. (d)(2).)



"An inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites." (§ 65583, subd. (a)(3).)

It is the "relationship" of current zoning ordinances that must be considered with respect to suitable housing sites. No hint of limitation may be found in the use of the term "relationship." Section 65583 also requires that a housing element include a five-year program that will:

"Identify adequate sites which will be made available through appropriate zoning and development standards and with public services and facilities needed to facilitate and encourage the development of a variety of types of housing for all income levels . . . ." (§ 65583, subd. (c)(1).)

Such language unmistakably contemplates that zoning ordinances and land use restrictions may require modification during the five-year period to accommodate a locality's projected housing needs. Consistent with this interpretation is the requirement that the five-year program:

"Address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing." (§ 65583, subd. (c)(3).)

These "governmental constraints" must be analyzed in detail in the housing element; the element must contain:

"Analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures." (§ 65583, subd. (a)(4).)

In sum, a local government must provide in its housing element for the existing and projected housing needs of all economic segments of the community. (§ 65583.) In doing so, it is required to identify suitable housing sites. (§ 65583, subd. (a)(3).) The city or county must identify those sites "which will be made available through appropriate zoning and development standards" during the ensuing five-year period. (§ 65583, subd. (c)(1).) It must "undertake to implement the policies and achieve the goals and objectives of the housing element through the administration of land use and development controls." (§ 65583, subd. (c).) The required consideration and evaluation of zoning changes necessary to meet the identified needs of the

community would be precluded by allowing existing zoning limitations to define what housing sites are "suitable."

A council of governments thus would not be able to perform the task mandated for it without consideration of land uses that are possible despite existing zoning restrictions. The "suitable sites" factor to be considered by a council pursuant to section 65584 must be read in conjunction with the phrase "land suitable for residential development" of section 65583 that requires consideration of zoning limitations but is not limited to lands presently zoned for such development.

In answer to the second question, therefore, we conclude that a council of governments must consider the availability of suitable housing sites based not only upon the existing zoning ordinances and land use restrictions of the locality but also based upon the potential for increased residential development under alternative zoning ordinances and land use restrictions when determining a locality's share of the regional housing needs.

### 3. Calculation of Income Levels

The third question presented is whether a council of governments is required to follow the regulations (Cal. Admin. Code, tit. 25, §§ 6910-6932) of the Department defining income categories when determining a locality's share of the regional housing needs. We conclude that it must.

Regulation 6926 states in part:

"'Very low income households' means persons and families whose gross incomes do not exceed the qualifying limits for very low income families established and amended from time to time pursuant to Section 8 of the United States Housing Act of 1937. The qualifying limits are set forth in Section 6932. These limits are equivalent to 50 percent of the area median income, adjusted for family size by the United States Department of Housing and Urban Development." (Cal. Admin. Code, tit. 25, § 6926, subd.(a).)

Regulation 6928 provides in part:

"'Lower income households' means persons and families whose gross incomes do not exceed the qualifying limits for lower income families as established and amended from time to time pursuant to Section 8 of the United States Housing Act of 1937. The qualifying limits are set forth in Section 6932. These limits are equivalent to 80 percent of the area median income, adjusted for family size and other adjustment factors by the United States Department of

Housing and Urban Development." (Cal. Admin. Code, tit. 25, § 6928; subd. (a).)

Regulation 6930 states in part:

"'Moderate income households' means persons and families who are not 'lower income households' and whose gross incomes do not exceed 120 percent of the area median income adjusted for family size in accordance with adjustment factors adopted by the United States Department of Housing and Urban Development in establishing income limits for lower income families. For purposes of this subchapter, the income limits are set forth in Section 6932." (Cal. Admin. Code, tit. 25, § 6930, subd. (a).)

These regulations are authorized by and are consistent with Health and Safety Code sections 50079.5 (lower income households), 50093 (moderate income households), and 50105 (very low income households).

A council of governments must determine a locality's share of the regional housing needs "of persons at all income levels within the area." (§ 65584, subd.(a).) This determination is to be "[b]ased upon data provided by the Department." (Ibid.) It is the Department that assesses the state housing needs upon which the regional housing needs are calculated. The Department is also required to revise any determination of regional housing needs made by a council that is inconsistent with the state housing needs. (Ibid.) The Department follows state law (Health & Saf. Code, §§ 50079.5, 50093, 50105; Cal. Admin. Code, tit. 25, §§ 6910-6932) in categorizing income levels for its calculations and the data provided to the councils. For a council to "base" its determinations upon the Department's data, we believe that it is directed to use the income categories selected by the Department. No other definitions of moderate income, lower income, or very low income may be found in state law governing this issue.

We note also that the Legislature has specifically referred to "persons and families of low or moderate income, as defined in Section 50093 of the Health and Safety Code" when mandating the review and revision of housing elements. (§ 65588, subd.(d).)

Requiring a council of governments to follow the income classifications established by the Legislature and Department provides consistency between sections 65584 and 65588. Such interpretation of the terms of section 65584 facilitates the administration of the state housing laws. Allowing each council of governments, on the other hand, to create its own income classifications would be impractical and would defeat the purpose of meeting the state housing needs in a consistent and effective

manner. Uniformity of classification allows the local governments "to cooperate with other local governments and the state in addressing regional housing needs." (§ 65580, subd. (e).)

In answer to the third question, therefore, we conclude that the income categories of sections 6910-6932 of title 25 of the California Administrative Code must be used by a council of governments when determining a locality's share of the regional housing needs.

\* \* \* \* \*





D

ADVISORY ON  
HOMELESSNESS  
(NON-BINDING)



## HOMELESSNESS IN THE SCAG REGION

### Addressing the Problem in the Housing Element

#### INTRODUCTION

The most recent housing element legislation requires municipalities to address the issue of the "homeless" currently within its jurisdiction. In an effort to assist cities and counties with this mandate SCAG provides this resource document on the homeless to accompany the Regional Housing Allocation Model. The information within includes the following:

- . Purpose and use of the "Homeless Component"
- . Nature and extent of the homeless problem
- . Causes contributing to homelessness
- . Potential funding sources

SCAG will continue to monitor the problems of the homeless and provide jurisdictions with technical assistance and updated demographic profiles. SCAG will provide advocacy efforts on behalf of the homeless as well as supporting legislation at all levels of government which assists in addressing this growing crisis. SCAG is available to assist in coordinating efforts throughout the region to maximize the resources available to the homeless. Most importantly, SCAG will continue to seek funding from both the public and private sectors to assist local cities and counties in meeting the needs of the homeless within their respective jurisdictions.

#### PURPOSE AND USE OF THE "HOMELESS COMPONENT"

SCAG has undertaken the task of providing this "Homeless Component" as a part of the Regional Housing Needs Assessment. The purpose is to provide cities and counties with a suggested basic format to address the homeless issue within updates of the housing element of the general plan as mandated by recent legislation. The sub-groups of the homeless population have been defined and an effort made to quantify the population within the SCAG region through the survey. The services appropriate to the sub-groups as well as potential funding sources are also identified. The homeless component is strictly advisory however the information and approach can easily be adapted to the needs of individual jurisdictions.

The information included herein is most useful if the definitions and causes of homelessness are reviewed for accuracy and applicability to the individual city or county. It is unlikely that in smaller cities and outlying areas that all sub-groups of the homeless population will be present. However, defining the population will assist in determining the services to be provided.

The results of the homeless survey are useful in comparing the city or county with other jurisdictions within the region. It is also the first step in monitoring the homeless population within communities. Each municipality is encouraged to regularly update these numbers as new indicators become available. A check with the beat officers and/or agencies that typically work with the homeless such as missions or churches may be sufficient to track the growth or reduction of the homeless within the community.

Once the estimated population is established and the sub-groups identified, it then becomes necessary to determine the appropriate services to meet the needs of the homeless. The Homeless Population Sub-Group and Service Matrix has been developed to provide communities with a basic index of the services needed by each sub-group. The matrix is not intended to be exclusive but only a guide to the most basic needs of each group.

The final segment of this report addresses the potential funding sources to be considered in establishing a program. The programs proposed for the homeless within a community's housing element are a critical component in that it expressly indicates the commitment of the city or county and also serves as the measurement for the adequacy of the housing element. Jurisdictions are cautioned to give particular attention to developing a realistic program section on the homeless.

#### **NATURE AND EXTENT OF THE HOMELESS PROGRAM**

In order to determine the services to be offered, it is also critical to define the homeless population. The following is suggested:

1. Those persons actually "sleeping out", i.e., makeshift shelter in cardboard boxes; under freeway overpasses and embankments; in cars or transportation areas such as bus or train depots.
2. Those in emergency shelters, missions, etc.
3. Those seriously "at risk"
  - . doubled up
  - . in marginal circumstances, e.g., sro housing
  - . motel population with limited stay
  - . AFDC or general relief recipient whose stipend has been cancelled twice within one year because there was no forwarding address

#### **QUANTIFICATION OF THE HOMELESS**

##### Responses to Questionnaire

Quantifying the homeless problem is necessary to define the services offered. Since there is no way to obtain absolute

numbers, a survey was developed by SCAG and sent to all jurisdictions within the region. Eighty-four (84) jurisdictions responded to the one page questionnaire. This represents 47% of the 180 jurisdictions within the SCAG region. Responses were received from four of the six county jurisdictions in the region and the remaining 80 responses were from municipalities

## Findings

### Estimates of Homeless Persons\*

Jurisdictions provided estimates of homelessness in one of three ways. Some local governments relied on published studies of homelessness in their area. Nine (9) jurisdictions used such studies to provide their estimates. A second method used was to rely upon the estimates of service providers and other experts in the field having special but reliable knowledge or experience with homelessness. Thirty-eight (38) responses were based on such expert estimation. The third method used reported homelessness based upon direct observation. A number of jurisdictions relied upon a field survey (in most cases conducted by the local police or sheriff's department) to produce an estimate of homeless persons. Thirty (30) jurisdictions relied on this type of estimation technique. Seven (7) other jurisdictions failed to report on the method used to obtain their figures.

The 79 municipalities report a total of 45,154 homeless persons. The vast majority, approximately 75%, of this total is accounted for by the City of Los Angeles. The four county jurisdictions report estimates for the entire county area, thus these estimates should be considered separately from city estimates. The counties of Los Angeles, San Bernardino, Ventura and Imperial estimated a total of 47,575 homeless persons. Again, the majority is accounted for by the County of Los Angeles which estimates 42,000 homeless individuals.

Listed below is a breakdown of estimate-ranges for the cities responding to the questionnaire.

<u>No. of Homeless</u>	<u>No. of Cities</u>
0	10
1 - 25	31
26 - 100	15
101 - 250	14
251 - 500	3
501 - 1000	0
1001+	6

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\*Given the lack of a comprehensive response by jurisdictions in the five-county SCAG region, these estimates cannot provide any conclusive, up-to-date revision of homeless persons in the area.



### Breakdown By Population

Respondents were asked to break down their homeless population by subgroup where possible. In more than half the cases, the respondents did not provide estimates of subpopulations. The following is the average percentage reported by jurisdictions for each of the sub-groups named.

	<u>Avg. Pct.</u>	<u>No. Responses</u>
Veterans	16.2%	19
Elderly	10.1%	23
Single Persons	63.3%	37
Persons in Families	21.8%	38
Mentally Ill	29.1%	29
Alcohol Abusers	40.8%	33
Substance Abusers	26.9%	28
Children	16.4%	30

### Services to the Homeless

Respondents were asked to report if there was an agency responsible for the coordination of services to the homeless in their area. Thirty (30) jurisdictions or 38% of the respondents reported that there were such agencies in their area. Of these agencies, thirteen (13) were public sector agencies and the balance were private, generally private non-profit organizations. The following is a breakdown of the existence of these agencies by the reported number of homeless in the cities which responded. As might be expected, jurisdictions reporting greater numbers of homeless were more likely to have an agency in existence coordinating services to that population.

<u>No. of Homeless</u>	<u>No. of Cities</u>	<u>Coordinating Agency</u>	<u>Public Agency</u>
0	10	1	1
1 - 25	29	6	1
26 - 100	12	4	1
101 - 250	13	8	1
251 - 500	3	2	2
501 - 1000	0	0	0
1000+	6	5	4

All four counties reported having an agency which coordinated services to the homeless in their area. Three of the four reported were public agencies.

### Homeless Sub-Populations

The homeless are further defined by the nature of the contributing factors which likely created the individuals homeless condition. The homeless population is no longer dominated by the stereotypical white, alcoholic male found

**HOMELESS POPULATION  
SUB-GROUP AND SERVICE MATRIX**

	Female Headed Hhlds (20%)	Families (25%)	Single Persons (75%)	Chronically Mentally Ill (33%)	Working Poor (15%)	Elderly (10%)	Veterans (35%)	Alcohol Abusers (20%)	Substance Abusers (20%)	Runaway Youth (?)	Undocumented Workers (?)
Veterans Counseling/Benefits							X				
Day Centers	X	X				X					
Mental Health Treatment/Care				X							
Employment Training			X		X		X		X	X	X
Alcohol/Drug Treatment								X	X		
Money/Case Management				X		X				X	
Food Programs	X	X	X	X	X	X	X	X	X	X	X
Income Supplements	X	X	X	X	X	X	X	X	X	X	X
Medical Aid	X	X	X	X	X	X	X	X	X	X	X
Emergency Shelters	X	X	X	X	X	X	X	X	X	X	X
Short-term, Transitional Shelters	X	X	X	X	X	X	X	X	X	X	X
Low-cost Permanent Housing	X	X	X	X	X	X	X	X	X	X	X

sleeping in the streets and alleyways of skid row. Today, the homeless population is as diverse as the population in general and crosses all ethnic and age boundaries. The homeless population of today is much younger than in the past and there is an alarming increase in the number of families. Very often the homeless population is now composed of a significant number of unemployed, low-skilled workers who are unable to find employment for which they are qualified; chronically mentally ill persons who may not be a danger to themselves within the legal requirements which would demand institutionalization, but who still are not able to adequately care for themselves; and, the substance abusers who now are typically poly substance abusers. Local government now finds itself in the position of having to provide varying levels and kinds of services depending the type of population within its jurisdictional boundaries. A matrix identifying homeless populations with services is included for reference.

## **CAUSES CONTRIBUTING TO HOMELESSNESS**

The contributing factors to homelessness are many and complex. However, the major substantiated causes appear to be unemployment, largely due to limited skills, and a breakdown in the family as a social and economic unit. These fundamental factors are further aggravated by the critical absence of affordable housing and cutbacks in social service programs. These social programs often were the difference whether or not a homeless person or family could be reintroduced into traditional living arrangements or prevented the homeless condition from occurring in marginal situations. The release of those previously institutionalized as chronically mentally ill or those who now are recognized as unstable but not sufficiently so for purposes of institutionalization also contribute significantly to the homeless numbers.

## **POTENTIAL FUNDING SOURCES**

### Major Private Resources

#### **Gannett Foundation, Rochester, N.Y.**

Has provided more grants for the homeless, nationwide, than any other private foundation. The foundation has awarded over 40 grants over the past three years covering building acquisition and rehabilitation, projects for children and youth, crisis intervention programs and health care projects, among others.

#### **Public Welfare Foundation, Washington, D.C.**

Funded over 30 homeless projects in the last three years. The focus of the projects has been on direct services including health and education programs. Shelter operations are also funded.

### **Arco Foundation, Los Angeles, CA**

The largest local giver, Arco has funded homeless projects which include a women's shelter, rehabilitation of shelter buildings, and children's programs. Volume of funds granted has decreased in recent years.

### **Robert Wood Johnson Foundation, Princeton, N.J.**

Funded over 20 homeless projects, nationally, since 1985. Homeless grants must have a health-service focus.

### **Food Banks**

Usually private, non-profit agencies which solicit donations from the private sector and distribute it to the needy. Food banks exists in every county.

## **MAJOR STATE OF CALIFORNIA PROGRAMS AVAILABLE FOR HOMELESS ASSISTANCE**

### **State Emergency Shelter Program**

Department of Housing and Community Development.

Funds available for shelter facility rehabilitation and expansion; site and/or facility acquisition; equipment; program costs (including staff); and one-time rent assistance for residents facing eviction. Priority in awards to programs assisting families with children.

### **Special User Housing Rehabilitation Program**

Department of Housing and Community Development.

Funds for the acquisition and/or rehabilitation of a) substandard housing to be occupied by the elderly after rehabilitation, b) group residences or apartments to be occupied by physically, developmentally, or mentally disabled after rehabilitation, or c) residential hotels to be occupied by low or very-low income persons after rehabilitation. Borrowers can be individuals, private owners, non-profit agencies or public agencies.

### **Deferred Payment Rehabilitation Loan Program**

Department of Housing and Community Development.

Funds for the rehabilitation of housing for low-income households. Low interest deferred payment loans made to local agencies or non-profits operating rehabilitation or code-enforcement programs using federal funds or California Housing Finance Agency funds.



### **California Department of Alcohol and Drug Programs**

This department provides funds directly to counties in California to support alcohol and drug treatment and prevention programs. Within state and federal guidelines, counties have complete discretion over the use of these funds.

### **Federal/State Surplus Property Programs**

Department of General Services, Office of Procurement.

Under this program the state is responsible for the distribution of both federal and state donated surplus property.

### **California Department of Veterans Affairs**

This department offers low interest home loans to qualified veterans. Counseling and representation for obtaining U.S. Veterans Administration benefits also provided.

### **Emergency Youth Shelter Project**

Office of Criminal Justice Planning.

Funds available for projects providing emergency counseling, group sessions counseling, job skills and independent living skills training, assessment and educational services. Pilot projects have been funded with future funding not assured.

### **Homeless Mentally Ill**

Department of Mental Health.

Funding for programs providing outreach, outpatient services, shelter bed facilities, and residential facilities for chronically mentally ill.

### **General Relief**

A State-mandated program administered at the county level. It is an income maintenance program, involving a cash grant to indigent individuals at levels set by the county board of supervisors.

## **MAJOR FEDERAL PROGRAMS AVAILABLE FOR HOMELESS ASSISTANCE**

### **Community Development Block Grant**

Federal grant program administered by entitlement cities and counties. The acquisition and/or rehabilitation of property for use as a homeless shelter is eligible. New construction of homeless shelters using CDBG funds is allowed if construction is done by a neighborhood-based nonprofit organization. The operating cost of a shelter is also eligible. This includes equipment, food, supplies, utilities and staff.



## **Federal Emergency Management Agency**

**Facility Rehabilitation:** A grant for the rehabilitation of shelter and food program facilities.

**Emergency Food and Shelter Program:** A grant for shelter operating expenses. Funds available for food purchasing, equipment for food preparation, and transportation of emergency food. Funds also available to shelter bed facility operations.

## **Community Services Block Grant**

A federal grant to the state, but administered locally by cities and counties. Emergency food and housing assistance, shelter services, operations, equipment and supplies are approved uses. Assistance in obtaining social and maintenance services and income support services for homeless individuals are also eligible.

## **Aid to Families with Dependent Children (AFDC)**

Cash grants provided on a bi-weekly basis to children and their parents if the family's income is insufficient to meet basic needs. Eligibility is limited to those needy families in which children are deprived of one or both parents due to incapacity, death or continuing absence.

Temporary shelter assistance is provided for families qualifying for AFDC who lack a fixed residence, live in a homeless shelter, or in a public or private place not designed for regular sleeping accommodations. Assistance for temporary shelter is made on a daily or weekly basis.

## **Supplemental Security Income (SSI)**

Cash grant assistance for aged, blind, or disabled persons who meet the program's income and resources requirements.

## **Food Stamps**

This program provides eligible individuals with coupons which may be used to purchase food. The program is administered by counties.

## **Health Care for the Homeless**

Department of Health and Human Services.

A grant program for health services to provide outpatient health services to the homeless in the community. Available to public and nonprofit agencies to provide primary health care and substance abuse services and, optionally, mental health services for homeless individuals.

**National Health Services Corps**  
Department of Health and Human Services.

Population groups (including the homeless) which have a shortage of health professionals serving it may receive the services of a National Health Service Corps provider.

**Supportive Housing Demonstration Program**  
Department of Housing and Urban Development.

A demonstration program to provide housing and supportive services for homeless individuals and families with special needs. Funds will be targeted for deinstitutionalized homeless individuals, homeless families with children and homeless individuals with mental disabilities and other handicaps.

**Supplemental Assistance for Facilities to Assist the Homeless**  
Department of Housing and Urban Development.

Authorizes funds for emergency shelters and supportive housing projects. DHUD will supplement funds received under the Emergency Shelter Grants Program or the Supportive Housing Demonstration Program to meet the needs of special population groups and to provide comprehensive assistance for innovative programs. Non-interest bearing advances to cover costs in excess of the assistance provided under the other two programs for acquisition, lease, renovation or conversion of facilities.

**Emergency Shelter Grant Program**  
Department of Housing and Urban Development.

Grants to state and local governments for renovation, rehabilitation or conversion of facilities to be used for emergency shelters. for the provision of essential services, and for maintenance and operating costs.

**Section 8 Moderate Rehabilitation**  
Department of Housing and Urban Development.

Funding for the HUD Section 8 Moderate Rehabilitation Assistance program to be used to rehabilitate Single Room Occupancy dwellings for occupancy by homeless individuals. Allocation will be on the basis of a national competition between applicants. Public housing authorities will receive these certificates which will be allocated on a project basis.

**Homeless Veterans Reintegration Projects**  
Department of Labor.

Funds made available to state and local public agencies for programs which provide outreach staffed by veterans who have been homeless. Programs should be linked with other service programs benefitting veterans.

**Adult Education**

Department of Education.

Makes homeless individuals eligible for adult education services. Authorizes the Department of Education to make grants to state educational agencies to develop and implement a program of literacy training and basic skills remediation for adult homeless individuals.

**Education for Homeless Children and Youth**

Department of Education.

The Department of Education makes grants to state and local educational agencies to assure a free and appropriate public education for homeless children, to establish or designate an Office of Coordinator of Education of Homeless Children and Youth, and to carry out a state plan which provides for the education of homeless children.

**Job Services Program**

Department of Labor.

Federal program administered by the California Employment Development Department (EDD) which provides assistance to the unemployed to find jobs, and provides assistance to employers to locate and hire qualified workers.

**Jobs Training Partnership Act (JTPA)**

Department of Labor.

Federal program administered by EDD. Provides funds for job training and transitional living expenses during counseling and training period.

**Mental Health Block Grants**

Department of Health and Human Services.

Federal grant program to the state. Funds are available for support of outreach services, community mental health services, referrals to health services, and substance abuse treatment. Diagnostic, crisis intervention and rehabilitation services are also funded.

**Job Training for the Homeless**

Department of Labor.

Funds to support job training demonstration projects for the homeless. Grants are made to state and local public agencies, private, and non-profit agencies.

**Runaway and Homeless Youth**  
Department of Labor.

Grants to establish and operate short-term and emergency shelters for runaways. Also funds programs which include home-shelters and networks of agencies to support services to runaway youths. Competitive grants available to states, local governments, private and non-profit organizations.

E

RESULTS OF  
REVISION PROCESS





## APPENDIX E

### RESULTS OF REVISION PROCESS

On December 15, 1988 the SCAG Executive Committee brought the Regional Housing Needs Assessment (RHNA) process to a successful conclusion by approving the remaining revisions to the RHNA adopted by it on June 30 1988.

The agenda attachment for that meeting as well as pertinent parts of the November 3, 1988 Executive Committee attachment are reproduced here on Pages E-7 to E-25. They summarize the revisions which were made.

Foremost among the revisions were those approved in response to requests from cities received as part of the appeals process established in the State Housing Law. Forty-six cities and two counties, acting as local jurisdictions for their unincorporated areas, availed themselves of this opportunity to have their RHNA allocations reviewed by SCAG in light of special local circumstances that they brought to SCAG's attention.

A map and list of jurisdictions submitting RHNA letters of appeal, as well as a summary breakdown of the requests by type, are included in Pages E-4, E-5, and E-6.

The RHNA Subcommittee, which was established in 1987 to work on the policy and method decisions that went into the RHNA, acted as a reviewing committee. Their recommendations were then forwarded to the Community, Economic and Human Development (CEHD) Committee. The CEHD, in turn, made their recommendations to the Executive Committee for final action.

Also approved were some important Advisories included in Appendix F. These Advisories cannot be binding on the jurisdictions due to the complexities of the State Housing Law, but result in assessments of need for each of them that are more realistic than those contained in the "official" RHNA allocations. Rather than wait another five years to improve our estimates, staff felt that such improvements could be made now. These advisory numbers can therefore be used by those jurisdictions wishing to use them in their upcoming Housing Elements and SCAG will support such choices during the State HCD review.

The major Advisory affecting the 132 jurisdictions that did not request revisions to their RHNA allocations, reduces by 50% that part of the vacancy

adjustment attributable to existing vacancy deficiencies, by recognizing that ten rather than five years is a more realistic period during which this existing problem can be corrected. Those 48 jurisdictions that did appeal received this adjustment as part of their revision.

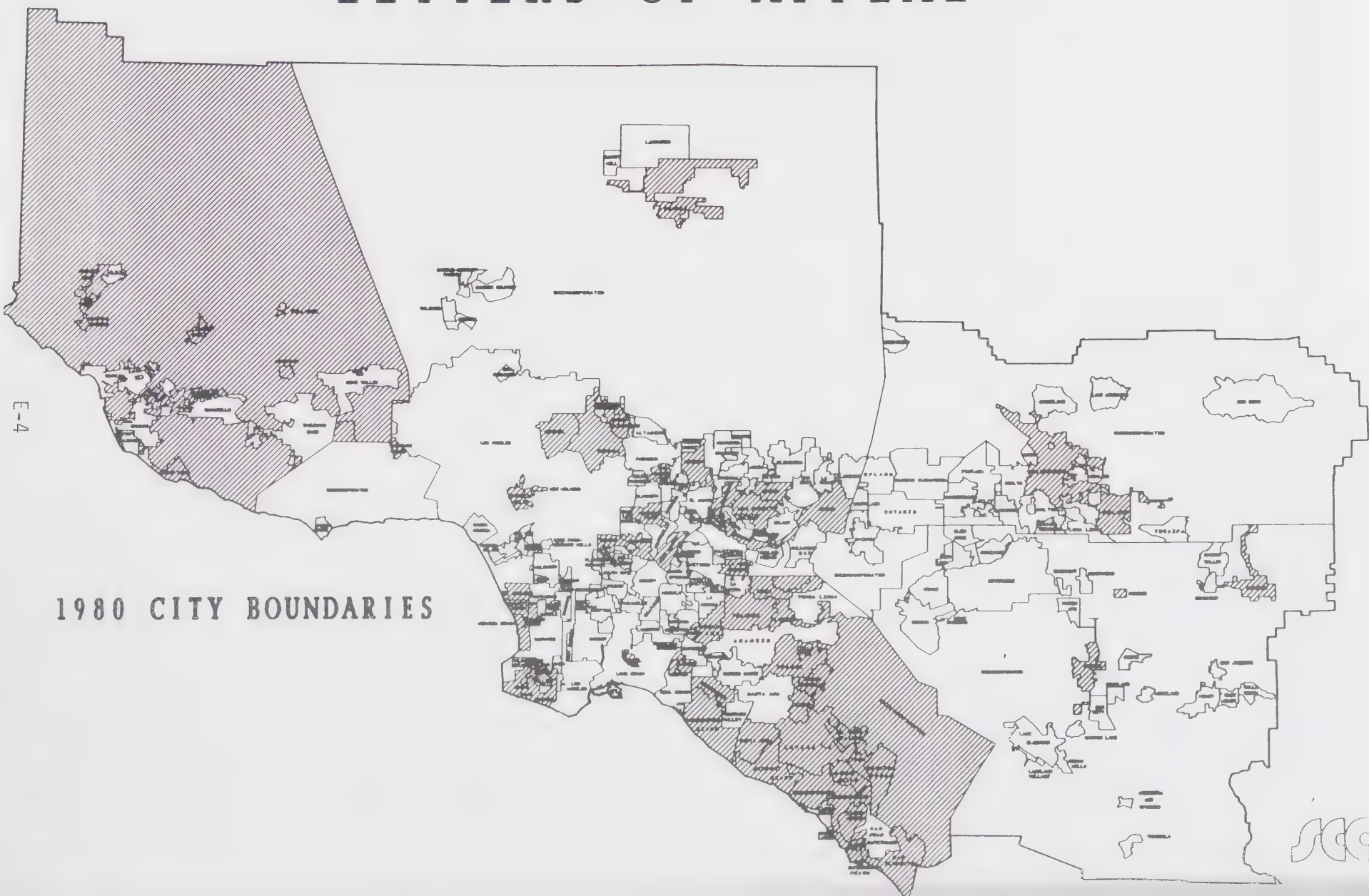
The following table, Summary of RHNA Revisions, summarizes the requests made and the final disposition. Only one request for a change in income distribution was granted. All other change affected Future Need totals.

TABLE 43

## SUMMARY OF RHNA REVISIONS

JURISDICTION	CHANGE IN ALLOCATION				REQUESTED CHANGE				OTHER
	TOTAL	HHG	V ADJ	DEMO	TOTAL	HHG	V ADJ	DEMO	
ARCADIA	-262	-142	-121	0		-142			
BALDWIN PARK	-601	-580	-22	0	-601				
BEVERLY HILLS	-322	0	-194	-128					
BURBANK	-828	0	-41	-787				-128	
COMMERCE	-233	-169	-76	13	-233	-169	-77	-787	
COVINA	-798	-660	-138	0	-708			13	
EL SEGUNDO	-84	0	-84	0	-481				
GLENDALE	-1,507	0	-488	-1,020	-1,896		-876	-1020	
HERMOSA BEACH	-434	-324	-109	0	-434				
HIDDEN HILLS	0	0	0	0					eliminate VL, L, &M *
INDUSTRY	0	0	0	0	-94	-86	-3	-5	
LA CANADA/FLNTRD	-57	0	-56	0					reduce VL, L &M from 104 TO 29 *
LA HABRA HEIGHTS	-9	0	-9	0					eliminate VL, L, &M *
MANHATTAN BEACH	-347	-336	-10	0	NA				reduce % VL & L *
MONTEREY PARK	-523	-341	-183	0	-923				
PALMDALE	-634	0	-635	0			-635		
PICO RIVERA	-671	-544	-128	0	-671				
POMONA	-639	-621	-19	0	-671				
RANCHO PALOS VER	-384	-318	-65	0	-473				
REDONDO BEACH	-773	-540	-232	0	-825	-474	-351		
ROLLING HILLS ES	-178	-170	-8	0	-178				eliminate VL, L, &M *
SAN MARINO	-42	0	-42	0	-42				
SIGNAL HILL	-386	-354	-33	0	-365	-354	-11		
VERMON	-76	-36	-1	-38	-76	-36	-1	-38	
WEST COVINA	-838	-678	-160	0	-678	-678			
WEST HOLLYWOOD	-434	0	-434	0	-202		-320		
BREA	-73	0	-73	0	-786				
BUENA PARK	-461	-248	-213	0	-609	-590	-19		
COSTA MESA	-1,192	-865	-327	0	-3,135	-2,539	-596		
FULLERTON	-319	0	-319	0	-800				
HUNTINGTON BEACH	-558	0	-558	0	-3,583				
IRVINE	-1,149	-969	-180	0	-1,149	-710	-418		
LOS ALAMITOS	-44	0	-44	0	-143				
NEWPORT BEACH	-787	-761	-25	0	-1,266				reduce VL & L from 34% to 15% *
PLACENTIA	-54	0	-54	0				NA	
SAN CLEMENTE	-990	-785	-205	0	-1,227				
TUSTIN	-781	-563	-218	0		per OC per DOF		-17	
WESTMINSTER	-218	0	-218	0	-985	-598	-387		
ORANGE C UNINC&N	8,051	8,397	-217	-130	8,237	8,367		-130	
BANNING	2,567	2,495	72	0	2,567				
MORENO VALLEY	0	0	0	0	NA				
PERRIS	5,564	5,389	175	0	5,564				Change incomes to county's **
REDLANDS	0	0	0	0	-1,981				
SAN BERN. CITY	0	0	0	0	-2,468				
MOORPARK	-575	-561	-14	0	-2,315				
OJAI	-102	-81	-20	0	-110				
SANTA PAULA	-109	-29	-81	0	-109				
VENTURA C. UNINC	-695	-533	-162	0	-547	-533	-14		
TOTAL IM REGION	-2,985	5,073	-5,969	-2,090					(** APPROVED) (* DENIED)

# JURISDICTIONS SUBMITTING RHNA LETTERS OF APPEAL



1980 CITY BOUNDARIES



## LIST OF RHNA APPEALING JURISDICTIONS

### Los Angeles County

Arcadia  
Baldwin Park  
Beverly Hills  
Burbank  
Commerce  
Covina  
El Segundo  
Glendale  
Hermosa Beach  
Hidden Hills  
Industry  
La Canada Flintridge  
La Habra Heights  
Manhattan Beach  
Monterey Park  
Palmdale  
Pico Rivera  
Pomona  
Rancho Palos Verdes  
Redondo Beach  
Rolling Hills Estates  
San Marino  
Signal Hill  
Vernon  
West Covina  
West Hollywood

### Orange County

Brea  
Buena Park  
Costa Mesa  
Fullerton  
Huntington Beach  
Irvine  
Los Alamitos  
Newport Beach  
Orange County  
Placentia  
San Clemente  
Tustin  
Westminster

### Riverside County

Banning  
Moreno Valley  
Perris

### San Bernardino County

Redlands  
San Bernardino City

### Ventura County

Moorpark  
Ojai  
Santa Paula  
Ventura County

Regional Housing Needs Assessment (RHNA)  
Local Revision Requests

	Region	Los Angeles	Orange	Riverside	San Bernardino	Ventura	Imperial
Jurisdictions Filing An Appeal	48	26	13	3	2	4	0
Revisions Requested	70	39	20	3	2	6	0
Impacted Jurisdictions	14	5	3	3	1	2	0
Non-impacted Jurisdictions	33	21	8	0	1	2	0
TOTAL	47	26	11	3	2	4	0
Revisions by Type:							
Change Future Growth*	37	19	9	3**	2	4	0
Change Vacant Units Needed	12	6	6	0	0	0	0
Change Placement Housing Needed	9	5	3	0	0	1	0
Eliminate or Change Lower and Moderate Income Housing Needed	9	7	1	0	0	1	0
Change Overpayment Needed	3	2	1	0	0	0	0
TOTAL	70	39	20	3	2	6	0

\* Changes in future household growth will automatically adjust additional vacant units needed.

\*\* These communities requested an increase in growth -- all other communities requested a decrease.

## M E M O R A N D U M

October 24, 1988

TO: Executive Committee  
FROM: Community, Economic and Human Development Committee  
SUBJECT: RHNA REVISION RECOMMENDATIONS

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On recommendation of the RHNA Subcommittee to the Community Economic and Human Development (CEHD) Committee, the CEHD at its October 20, 1988 meeting reviewed Proposed Local Revisions by eleven jurisdictions to the 1988 Regional Housing Needs Assessment, and recommend the following action on these Proposed Local Revisions:

- o Approval of the Proposed Local Revisions by:
  - 1. Beverly Hills to reduce demolition adjustment from 280 to 152. This revision is based on demolition data supplied by the city.
  - 2. Burbank to reduce demolition adjustment from 1,467 to 680. This revision is based on demolition data supplied by the city.
  - 3. Palmdale to change vacancy adjustment from 317 to -318. This revision is based on elimination of "Second Home Community" designation.
  - 4. Vernon to eliminate total future need of 76. This revision is based on multiple environmental deficiencies resulting in lack of suitable sites.
- o Approval in part and Denial in part of the Proposed Local Revision by Glendale; Approval of reduction of demolition adjustment from 1932 to 912 based on demolition data supplied by the city; Denial of vacancy adjustment from 1,129 to 253. Vacancy data from the city defined "vacancy" to include unoccupied units not for sale or for rent and excluded master-metered units from the survey. Accepting different definition of vacancy would result in lack of uniformity in regional allocations.
- o Denial of the Proposed Local Revisions by:
  - 1. Brea to reduce vacancy adjustment from 190 to -596. The basis for this proposed revision and the reason to recommend its denial are identical to Fullerton's below.

Memorandum to: Executive Committee

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October 24, 1988

2. Fullerton to reduce vacancy adjustment from 672 to -128. The basis for this proposed revision was use of State Department of Finance (DOF) unoccupied unit rate rather than Federal Home Loan Bank Board (FHLBB) vacancy rate used in RHNA. The DOF rate includes unoccupied units not for sale or for rent and approval of the requested revision would eliminate comparability and uniformity in regional allocations.
3. La Habra Heights to eliminate very low, low, and moderate income future need and reallocate it to upper income need. State housing law does not provide for changing future need income category allocations except to avoid impaction or to correct a factual error (e.g., census data error).

NOTE: The denial of the proposed revisions to vacancy adjustments in Glendale, Brea, and Fullerton would be done with the specific provision that those units, within the definition of "vacancy" rejected by SCAG, which became available for sale or rent would be counted as fulfilling part of the future need identified in the RHNA.

In addition, the CEHD made the following schedule decisions and will make its recommendations in the future:

Postponement of consideration of the Proposed Local Revisions by:

Hidden Hills

La Canada/Flintridge

Continued consideration of the Proposed Local Revision by West Hollywood.

Attached are the request for revision letters from each of the cities on whose request recommendations are made, as well as the original staff recommendation for each.

JM/bam

## M E M O R A N D U M

December 15, 1988

TO: Executive Committee

FROM: Community, Economic and Human Development Committee

SUBJECT: PROPOSED REVISIONS TO THE REGIONAL HOUSING NEEDS ASSESSMENT

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At the RHNA Subcommittee meeting on November 3, 1988, the members reconsidered the length of time communities should have to address existing vacant unit need and reviewed proposed local revisions to the Regional Housing Needs Assessment (RHNA) by 18 jurisdictions. It recommended the following actions which were, in turn, recommended by the CEHD Committee at its November 17, 1988 meeting:

- o Approval of a 10 year rather than a 5 year basis for achieving the ideal existing housing vacant unit need in cases where a community has less than the ideal number of vacant units. This will allow a 50% reduction in this component of housing need. The future vacant unit need associated with growth would not be affected.

The RHNA Subcommittee felt that asking communities to build additional units to house expected households with an ideal vacancy rate, while also requiring communities to go back to the existing housing stock and, in those cases where the vacancy rate is lower than the ideal, demand that that vacancy rate be corrected in five years, is burdensome. This is particularly true in the "built out" urban area where the housing market has been "tight" for 10 years or more and existing vacant unit need is, in a number of cases, higher than anticipated household growth. Also, in densely developed cities with a high proportion of multifamily units (predominately "affordable" housing), current policy forces them to become even more densely developed and "impacted" with low cost units if for no other reason than to meet ideal vacancy levels.

The change is intended to establish a more realistic timeframe for meeting the ideal vacancy goal for the existing housing stock and to equalize extra vacancy goals between single and multifamily type localities. It would be applied to all jurisdictions submitting a local revision request, while an advisory would be sent to all other communities recommending that they incorporate this change in their revised local housing needs assessment.



The CEHD Committee, at its November 17, 1988 meeting also recommended approval of the following adjustments to the RHNA which were recommended to it by the RHNA Subcommittee at its November 3, and 17, 1988 meetings.

1. Orange County Unincorporated: Approved the requested demolition adjustment and increase in household growth for the southeast unincorporated area and new cities by 8,397 households. This revision will be further broken down to separate the new city growth estimates from the county unincorporated area forecast. The change is based on more recent data provided by the county. The new data enables the unincorporated area to be treated as if it were a city rather than as a residual after all city adjustments are made. This change redistributed growth in the south county subregion.

An advisory will be sent to all communities in the subregion notifying them of the change in growth distribution, and the adjustment will be implemented for localities from the area that have submitted local revision requests based in whole or in part on the growth distribution method (e.g., Costa Mesa, Irvine, Newport Beach and San Clemente).

Approved a housing vacancy need adjustment based on the additional growth and new goal for addressing existing vacancy need by 1994.

#### 1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
* ORIGINAL	21,325	19,726	771	592	235
* REVISED	29,458	28,123	386	844	105

\* Includes new cities (minus 2,741 units for Mission Viejo and 2,526 for Dana Point)

2. Costa Mesa: Evaluated the city request for a reduction of future housing unit need from 5,155 to 2,020 and use of substitute local vacancy data. Approved a reduction of future housing need from 5,155 to 3,963 based on a redistribution of growth in southeast Orange County. Denied substitute local vacancy data since it would eliminate comparability across the region. Approved a change in the existing housing vacancy need goal for 1994.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	5,155	4,332	593	156	75
REVISED	3,963	3,467	297	124	75

3. Irvine: Approved local revision request to reduce total future housing unit need from 14,337 to 13,188 and denied change in ideal vacancy level. Change is based on the redistribution of growth in southeast Orange County. Denied substitute ideal vacancy level since it would eliminate comparability across the region, but approved new vacant unit need levels based on the drop in household growth and a new goal for addressing existing vacant unit need by 1994.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	14,337	13,642	307	386	2
REVISED	13,188	12,673	154	359	2

4. Newport Beach: Partial approval of local revision request. Evaluated the city request to reduce future housing unit need from 2,849 to 1,583 and to reduce affordable housing need to no more than 240 units. Approved a 2,349 unit future need based on the redistribution of growth in southeast Orange County and further reduced it to 2,062 units as a result of an assessment of annexations that influenced original estimates. Denied change in income distribution of future need since neither error nor avoidance of impaction were issues.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	2,849	2,535	-136	84	365
REVISED	2,062	1,774	-136	59	365

5. San Clemente: Evaluated the city request to reduce future housing need from 4,227 to 3,000 units. Approved a 3,237 unit future growth based on the redistribution of growth in southeast Orange County and denied any further reduction due to the existence of available sites. Approved a new goal for addressing existing vacant unit need by 1994.

1989-1994 FUTURE NEED					
	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	4,227	3,712	360	120	35
REVISED	3,237	2,927	180	95	35

6. Ventura County Unincorporated: Approved request to reduce anticipated household growth from 3,109 to 2,576. This change is based on the same method used in adjusting the growth in the Orange County Unincorporated area. An advisory will be sent to all jurisdictions in the Simi/Thousand Oaks subregion notifying them of the change and its redistributational impact.

Approved an adjustment to vacant unit needs based on the lower level of growth and new policy on addressing existing vacant unit need by 1994.

1989-1994 FUTURE NEED					
	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	3,573	3,109	297	79	88
REVISED	2,878	2,576	149	65	88

7. Moorpark: Evaluated the city request to reduce future need from 3,318 to 1,003 units. Approved a reduced housing unit need of 2,743 based on a 1984-86 550/year growth trend, eliminating the "bulge" of 1,530 units in 1987 that resulted from a local ordinance and not trend.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	3,318	3,311	-83	85	5
REVISED	2,743	2,750	-83	71	5

8. Santa Paula: Approved local revision request to reduce future need from 729 to 620 units based on the County AQMP limit of 124 units/year. Other proposed constraints were not deemed to be sufficient. Approved an adjustment in the 1994 existing housing vacant unit goal.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	729	516	161	16	37
REVISED	620	487	81	15	37

9. Commerce: Approved local revision request to eliminate household growth and vacancy adjustment and increase replacement housing need from 73 to 86 units. Revision is based on severe environmental constraints and local demolition data.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	319	169	72	5	73
REVISED	86	0	0	0	86

10. El Segundo: Evaluated the local revision request to reduce future housing need from 1,196 to 715. The change was not approved since the City indicated that it had the capacity to grow to the projected level by 1994. City concerns about the rate of growth, given economic and

regulatory constraints, pertains more to 1994-2010 growth. Approved an adjustment in the 1994 existing housing vacant unit goal.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	1,196	844	169	30	153
REVISED	1,112	844	85	30	153

11. Hermosa Beach: Approved the local revision request to reduce future housing need from 947 to 513 units. The change is based on an error in the application of the growth distribution methodology. Approved a change in the 1994 existing housing vacant unit goal.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	947	485	196	17	248
REVISED	513	161	98	6	248

12. Hidden Hills: Because state housing law does not provide for change in future need income distribution except to avoid impaction or to correct a factual error, the RHNA Subcommittee rejected a request for a second postponement, then denied the local revision to eliminate very low, low and moderate income future need, reallocating it to upper income need, and eliminating existing overpayment need.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	46	42	1	1	2
REVISED	46	42	1	1	2



13. La Canada-Flintridge: Because state housing law does not provide for changing future need income categories except to avoid impaction or to correct for a factual error, the RHNA Subcommittee rejected a request for a second postponement, then denied the local revision to reduce very low and low and moderate income housing need from 104 to 29, and reallocate it to upper income need. Approved a new goal for addressing existing vacant unit need by 1994.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	323	198	112	4	8
REVISED	266	198	56	4	8

14. Pico Rivera: Approved the local revision request to reduce future need from 1,266 to 595. The request to reduce lower income housing need was withdrawn. The basis for the change was the lack of available sites as 50 of the 96 vacant acres were found to be on school sites that are not available for housing development, nor are anticipated to be available by 1994 due to increased school enrollments.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	1,266	914	228	23	102
REVISED	595	370	114	9	102

15. Redondo Beach: Approved the local revision request to reduce future household growth as a result of an assessment of annexations that influenced the original estimate. Denied requested vacancy adjustment reduction, but approved a change to the 1994 existing housing vacant unit goal.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	3,803	2,365	427	88	923
REVISED	3,030	1,825	214	68	923

16. San Marino: Approved the local revision request to reduce future need from 60 to 18 units due to land unavailability. Approved a new existing housing vacant unit goal per new RHNA Policy.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	60	2	56	0	2
REVISED	18	2	14	0	2

17. Signal Hill: Approved local revision request to reduce future household growth from 708 to 354 because of limited site availability due to oil production, slopes and soil conditions. Approved a change in the 1994 existing housing vacant unit goal.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	805	708	38	27	32
REVISED	419	354	19	14	32

18. West Hollywood: Evaluated the proposed vacancy adjustment from 879 to 559 units due to unavailability of sites, lack of recycling potential, local regulations on demolitions, infrastructure and other constraints. Rent control has increased unit demand and artificially increased existing housing vacant unit need. Rent control was not deemed to be a basis for establishing a lower ideal vacancy level.

However, due to the new policy on addressing existing housing vacancy goals by 1994, the total housing need was adjusted from 1,102 to 668 units.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	1,102	206	870	10	17
REVISED	668	206	435	10	17

19. Buena Park: Evaluated requested revision of future need for the 6-1/2 year 1988-1994 period from 1,855 to 913 units. Partly approved the reduction based on lack of enough available sites and recent recycling rates. Adjusted existing vacancy need by 1994 per new RHNA policy.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	1,522	1,004	409	31	78
REVISED	1,061	756	205	22	78

20. Huntington Beach: Evaluated requested reduction of future need from 6,786 to 3,203 units based on environmental constraints and site unavailability. Denied this revision because land not now zoned residential was potentially available. Adjusted existing vacancy need by 1994 per new RHNA Policy.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	6,786	5,360	1,117	171	138
REVISED	6,228	5,360	559	171	138

21. Los Alamitos: Evaluated requested revision to reduce future need from 443 to 300 units. Denied the revision because adequate sites are available. Adjusted 1994 existing vacancy goal per new RHNA Policy.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	443	266	88	9	80
REVISED	399	266	44	9	80

22. Placentia: Requested reduction of demolition adjustment denied since no basis provided. Adjusted 1994 existing vacancy goal per new RHNA Policy.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	1,672	1,501	109	44	18
REVISED	1,618	1,501	55	44	18

23. Tustin: Evaluated requested revision of existing need, vacancy adjustment, demolition adjustment, and household growth. Approved in part household growth reduction based upon change in Orange County unincorporated forecast for Southwest Orange subregion. Denied other revisions, but adjusted 1994 existing vacancy goal per new RHNA Policy.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	2,866	2,314	393	92	67
REVISED	2,085	1,751	197	70	67

24. Westminster: Evaluated requested reduction of household growth from 975 to 377 and vacancy adjustment from 467 to 80. Denied household growth reduction request due to availability of sites and vacancy reduction since approval would lead to lack of conformity regionwide. Adjusted 1994 existing vacancy goal per new RHNA Policy.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	1,524	975	437	30	82
REVISED	1,306	975	219	30	82

25. Banning: Approved requested increase in future need based upon market demand, approved projects, and building trends. To be offset by advisory reduction on Riverside County unincorporated.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	948	333	0	25	35
REVISED	3,515	3,383	0	97	35

26. Moreno Valley: Approved requested increase in future need based upon market demand and building trends. To be offset by advisory reduction in Riverside County unincorporated.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	17,741	17,410	-107	424	15
REVISED					



27. Perris: Approved requested increase in future need based upon market demand, approved projects, and building trends. To be offset by advisory reduction in Riverside County Unincorporated. Also adjusted 1994 existing vacancy goal per new RHNA Policy.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	1,945	1,839	12	62	32
REVISED	7,509	7,228	6	243	32

28. Redlands: Because State Housing Law does not permit revisions based on local growth control ordinances, the committee denied the requested reduction of future need from 3,981 to 2,000 units.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	<>	<>	<>	<>	<>
REVISED	<>	<>	<>	<>	<>

29. City of San Bernardino: Because adequate potential sites are available, the requested reduction of future need from 8,021 to 5,553 units was denied. The physical and fiscal constraints to this level of development, however, are valid bases for revisions to the local housing element and SCAG will support the jurisdiction in seeking approval of this revision from the State HCD.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	<>	<>	<>	<>	<>
REVISED	<>	<>	<>	<>	<>

30. Ojai: Approval of requested reduction of future need based upon Ventura AQMP limit. Adjustment of 1994 existing vacancy goal per new RHNA Policy.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	243	193	36	5	8
REVISED	133	112	18	3	8

31. Arcadia: Reduce household growth to 500 based on sites availability and recycling potential. Adjust 1994 existing vacancy goal per new RHNA Policy.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	1,067	642	234	20	172
REVISED	805	500	117	16	172

32. Baldwin Park: Approval of requested reduction of future need from 1,228 to 627 units based upon lack of available sites. Adjusted 1994 existing vacancy goal per new RHNA policy.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	1,228	938	14	25	252
REVISED	627	358	7	10	252

33. Covina: Approval of requested reduction of future need based on lack of sufficient suitable sites. Revised total based upon city's proposed acceleration of recycling and rezoning of part of non-residential vacant land. Adjusted 1994 existing vacancy goal per new RHNA policy. Denied change in demolition adjustment.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	1,744	1,403	236	43	92
REVISED	976	743	118	23	92

34. Industry: Because sites are available and no constraints beyond local zoning appear, requested elimination of future need was denied.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	<>	<>	<>	<>	<>
REVISED	<>	<>	<>	<>	<>

35. Manhattan Beach: Approval of reduction in future need based upon correction to growth forecast methodology. Adjusted 1994 vacancy goal per new RHNA Policy. Denied change in income distribution of future need per State Housing Law.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	1,435	981	4	27	423
REVISED	1,088	645	2	18	423

36. Monterey Park: Partial approval of requested reduction of future need from 1,423 to 500 units based on unavailability of sites due to hillside land and built-up character of city. A reduction to 900 units was approved due to development trends. Adjusted 1994 vacancy goal per new RHNA Policy.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	1,423	824	345	24	230
REVISED	900	483	173	14	230

37. Pomona: Approval of requested revision of future need based upon lack of sufficient available sites.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	2,736	2,593	-132	79	197
REVISED	2,097	1,972	-132	60	197

38. Rancho Palos Verdes: Approved reduction in future need for 886 to 502 units. City requested reduction to 413 units based on site availability and other constraints. Error in DOF base data is basis for this revision. Adjusted 1994 existing vacancy goal per new RHNA Policy. Denied existing need change as not consistent with RHNA methodology.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	886	748	115	19	3
REVISED	502	430	58	11	3

39. Rolling Hills Estates: Approved requested reduction in future need form 208 to 30 units based on limited available sites due to topography, and lack of infrastructure. Denied requested revision in income distribution per State Housing Law. Adjusted 1994 existing vacancy goal per new RHNA Policy.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	208	192	9	4	3
REVISED	30	22	5	0	3

40. West Covina: Approved requested reduction in future need household growth from 1,619 to 941 units based on change in growth forecast methodology. Denied existing need reduction per State Housing Law. Adjusted 1994 existing vacancy goal per new RHNA Policy.

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
ORIGINAL	1,988	1,619	280	45	43
REVISED	1,150	941	140	26	43

Finally, the CEHD approved the RHNA Subcommittee's recommendation that the 1994 existing vacancy goal changes also be made in those jurisdictions whose revision requests were heard earlier. The resultant approved revisions would be as follows:

1989-1994 FUTURE NEED

	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
<u>Brea</u>					
ORIGINAL	1,673	1,372	147	43	112
REVISED	1,600	1,372	74	43	112



1989-1994 FUTURE NEED					
	TOTAL	HH GROWTH	EX. VAC.	ADDITIONAL VACANCY	DEMOLITION ADJUSTMENT
<u>Fullerton</u>					
ORIGINAL	1,756	1,011	639	33	73
REVISED	1,437	1,011	320	33	73
<u>Beverly Hills</u>					
ORIGINAL	1,157	470	389	18	280
REVISED	835	470	195	18	152
<u>Burbank</u>					
ORIGINAL	3,798	2,175	82	74	1,467
REVISED	2,970	2,175	41	74	680
<u>Glendale</u>					
ORIGINAL	7,108	4,048	977	152	1,932
REVISED	5,601	4,048	489	152	912
<u>La Habra Heights</u>					
ORIGINAL	119	93	19	2	5
REVISED	110	93	10	2	5

JC/bam



F

ADVISORY  
ALLOCATIONS



## APPENDIX F

### ADVISORY ALLOCATIONS

The Regional Housing Needs Assessment (RHNA) Subcommittee recommended and the SCAG Community, Economic and Human Development (CEHD) and Executive Committees approved the following “advisory” changes to the “official” allocations of Future Need shown in Chapter IV and Appendix B:

- Growth distribution in Southeast Orange County cities changed to reflect shift in growth to county unincorporated area;
- Growth distribution in Simi-Thousand Oaks area in Ventura County cities changed to reflect shift in growth away from county unincorporated area;
- Growth distribution in Central Riverside County changed to reflect shift from county unincorporated area to Banning and Perris; and
- Adjusting existing Vacancy Need to attain ideal vacancy rate in 10 years rather than 5 years.

The advisory allocations are not binding on a jurisdiction. They show what the redistributive effect of revised growth allocations have on all localities in affected subregional areas.

During the local revision period, adjustments in Future Need were made only for those communities that sought them. They were made either as corrections in the application of the methodology or in response to the submission of better data than that used initially in formulating the allocations.

The RHNA Subcommittee endorsed the advisory increasing to 10 years the period for attaining ideal vacancy rates. The original 5 year period was seen as burdensome, especially in the “built out” urban areas where the housing market has been “tight” for 10 years or more and existing vacant unit need is, in a number of cases, higher than anticipated household growth. Also, in densely developed cities with a high proportion of multifamily units (predominately “affordable” housing), a five year policy would force them to become even more densely developed and “impacted” with low cost units if for no other reason than to meet ideal vacancy levels.





The changes to 10 years in attaining ideal vacancy rates is intended to establish a more realistic timeframe for meeting the ideal vacancy level for the existing housing stock and to equalize extra vacancy goals between single and multifamily type localities. It was applied to all jurisdictions submitting a local revision request. The advisory applies the adjustment to all communities.

SCAG supports the use of advisory figures in place of the adopted allocation when a community feels that it better represents the level of need that may occur in the local housing element planning period.

The following tables display each jurisdiction's Advisory allocation. In addition, totals in each county and regionally approximate actual need more closely than the "official" revised quantities. This is due to the fact that changes which could not be made to jurisdictions which did not request revisions were made to the Advisory quantities.

In addition to the changes summarized above, the Advisory also includes changes in Riverside County to correct an original misallocation of growth in Indian Wells, a correction to an arithmetical error in Palmdale, and a removal of the Vacation Home designation for Irwindale.

In these and other ways, the Advisory Allocations are an attempt to elevate substance over form and make implementation of the RHNA as realistic and reasonable as possible.

TABLE 7A - LOS ANGELES COUNTY

## ADVISORY FUTURE HOUSING NEEDS BY INCOME CATEGORY

(25% IMPACTION AVOIDANCE ADJUSTMENT AND FURTHER ADJUSTMENT FOR HIGHLY IMPACTED LOCALITIES)

JURISDICTIONS	TOTAL	VL INC	LOW INC	MOD INC	HIGH INC	LOWER INC (%VL & L)	HIGHER INC (%MOD & UP)
AGOURA HILLS - R	1,650	160	177	213	1,099	20.5%	79.5%
ALHAMBRA	1,856	342	450	366	697	42.7%	57.3%
ARCADIA	805	109	137	124	436	30.5%	69.5%
ARTESIA	209	34	44	42	88	37.3%	62.7%
AVALON	218	33	52	43	90	39.3%	60.7%
AZUSA	1,492	283	346	311	552	42.2%	57.9%
BALDWIN PARK - R	627	111	151	144	221	41.7%	58.3%
BELL	207	30	45	55	77	36.1%	63.9%
BELLFLOWER	2,101	370	507	420	805	41.7%	58.3%
BELL GARDENS	104	17	24	30	33	39.5%	60.6%
BEVERLY HILLS - R	835	116	162	121	436	33.3%	66.7%
BRADBURY	26	3	4	3	16	23.9%	76.1%
BURBANK - R	2,968	505	640	584	1,239	38.6%	61.4%
CARSON	1,827	239	283	324	981	28.6%	71.4%
CERRITOS	1,420	116	131	190	983	17.4%	82.6%
CLAREMONT	757	98	116	111	431	28.4%	71.6%
COMMERCE - R	86	15	19	21	31	39.3%	60.7%
COMPTON	2,195	294	471	531	899	34.9%	65.1%
COVINA - R	976	150	191	173	461	35.0%	65.1%
CUDAHY	232	37	60	59	76	41.6%	58.3%
CULVER CITY	1,066	150	184	199	533	31.3%	68.7%
DOWNEY	1,467	233	281	282	672	35.0%	65.0%
DUARTE	927	141	199	195	392	36.7%	63.3%
EL MONTE	2,011	279	406	522	804	34.1%	65.9%
EL SEGUNDO - R	1,112	156	171	224	561	29.4%	70.6%
GARDENA	1,704	272	365	350	717	37.4%	62.6%
GLENDALE - R	5,597	982	1,308	1,059	2,249	40.9%	59.1%
GLENORA	1,159	146	192	195	627	29.1%	70.9%
HAWAIIAN GARDENS	488	66	90	138	195	32.0%	68.3%
HAWTHORNE	4,659	855	1,004	957	1,843	39.9%	60.1%
HERMOSA BEACH - R	513	76	82	95	259	30.9%	69.1%
HIDDEN HILLS	46	3	5	4	34	17.1%	82.9%
HUNTINGTON PARK	1,051	164	261	270	355	40.5%	59.5%
INDUSTRY	94	17	18	30	28	38.0%	62.1%
INGLEWOOD	1,463	194	268	373	628	31.6%	68.4%
IRVINDALE	34	5	8	8	13	38.9%	61.1%
LA CANADA FLNTRG-R	266	22	29	34	181	19.3%	80.7%
LA HABRA HEIGHTS-R	110	10	12	10	78	20.3%	79.7%
LAKEWOOD	982	124	151	187	519	28.1%	72.0%
LA MIRADA	938	99	120	167	551	23.4%	76.6%
LANCASTER	11,559	1,740	2,344	2,211	5,265	35.3%	64.7%
LA PUENTE	366	66	73	76	151	37.9%	62.1%
LA VERNE	912	135	160	177	440	32.3%	67.7%
LAWDALE	1,018	176	231	202	409	40.0%	60.0%
LOMITA	589	97	140	108	244	40.3%	59.7%
LONG BEACH	11,732	1,662	2,594	2,491	4,986	36.3%	63.7%
LOS ANGELES	113,742	17,448	27,139	21,922	47,233	39.2%	60.8%
LYNWOOD	405	52	76	103	174	31.5%	68.6%

TABLE 7 - CONTINUED

JURISDICTION	TOTAL	VL INC	LOW INC	MOD INC	HIGH INC	LOWER INC (%VL & L)	HIGHER INC (%MOD & UP)
MANHATTAN BEACH -R	1,088	120	137	167	664	23.6%	76.4%
MAYWOOD	197	29	41	53	74	35.5%	64.5%
MONROVIA	927	168	233	179	347	43.3%	56.7%
MONTEBELLO	683	116	155	134	278	39.7%	60.3%
MONTEREY PARK - R	899	141	177	169	412	35.4%	64.6%
NORWALK	1,244	196	238	266	544	34.9%	65.1%
PALMDALE - R	9,755	1,528	2,243	1,852	4,132	38.7%	61.3%
PALOS VERDES EST	302	20	26	30	227	15.2%	84.8%
PARAMOUNT	1,323	178	238	356	550	31.5%	68.5%
PASADENA	2,991	517	776	531	1,166	43.2%	56.8%
PICO RIVERA - R	595	102	120	126	247	37.3%	62.7%
POMONA - R	2,099	345	503	459	792	40.4%	59.6%
RANCHO P. VERDES-R	502	38	46	52	366	16.7%	83.3%
REDONDO BEACH - R	3,032	451	503	575	1,503	31.5%	68.5%
ROLLING HILLS	40	2	4	3	31	15.4%	84.6%
ROLLING HILLS ES-R	30	2	3	3	23	15.4%	84.6%
ROSEMEAD	720	128	170	149	273	41.4%	58.6%
SAN DIMAS	1,243	153	183	207	700	27.1%	72.9%
SAN FERNANDO	278	50	67	62	99	42.2%	57.8%
SAN GABRIEL	828	146	193	164	326	40.9%	59.1%
SAN MARINO - R	32	2	3	3	23	16.3%	83.7%
SANTA FE SPRINGS	260	42	54	55	109	37.0%	63.0%
SANTA MONICA	2,380	420	580	455	924	42.0%	58.0%
SIERRA MADRE	159	24	29	27	79	33.3%	66.7%
SIGNAL HILL - R	419	75	101	93	149	42.2%	57.9%
SOUTH EL MONTE	403	59	79	99	166	34.3%	65.8%
SOUTH GATE	660	88	123	163	286	32.0%	68.0%
SOUTH PASADENA	317	51	65	57	144	36.6%	63.4%
SANTA CLARITA - N	6,401	1,031	531	992	3,847	24.4%	75.6%
TEMPLE CITY	378	57	71	72	178	33.9%	66.1%
TORRANCE	3,536	466	555	618	1,897	28.9%	71.1%
VERNON	0	0	0	0	0	0.0%	0.0%
WALNUT	1,402	122	140	189	951	18.7%	81.3%
WEST COVINA	1,150	143	163	212	632	26.6%	73.4%
WEST HOLLYWOOD - R	668	102	140	120	307	36.2%	63.9%
WESTLAKE VILLAGE	465	47	49	64	305	20.6%	79.4%
WHITTIER	1,294	198	271	237	588	36.2%	63.8%
UNINCORPORATED - R	33,867	5,090	7,905	6,226	14,646	38.4%	61.6%
COUNTY TOTAL	269,165	40,877 15.2%	58,841 21.9%	51,674 19.2%	117,775 43.8%	37.0%	63.0%

TABLE 8A - ORANGE COUNTY

## ADVISORY FUTURE HOUSING NEEDS BY INCOME CATEGORY

(25% IMPACTION AVOIDANCE ADJUSTMENT AND FURTHER ADJUSTMENT FOR HIGHLY IMPACTED LOCALITIES)

JURISDICTION	TOTAL	VL INC	LOW INC	MOD INC	HIGH INC	LOWER INC (%VL & L)	HIGHER INC (%MOD & UP)
ANAHEIM	6,936	1,253	1,729	1,543	2,411	43.0%	57.0%
BREA - R	1,600	237	286	361	716	32.7%	67.3%
BUENA PARK - R	1,060	172	229	263	396	37.8%	62.2%
COSTA MESA - R	3,963	645	891	992	1,435	38.8%	61.3%
CYPRESS	694	91	112	156	336	29.2%	70.8%
FOUNTAIN VALLEY	692	87	95	146	364	26.3%	73.8%
FULLERTON - R	1,394	233	328	294	540	40.2%	59.8%
GARDEN GROVE	2,507	426	582	604	896	40.2%	59.8%
HUNTINGTON B - R	6,228	984	1,263	1,369	2,613	36.1%	63.9%
IRVINE - R	13,188	1,678	1,635	2,611	7,263	25.1%	74.9%
LA HABRA	973	173	229	219	352	41.3%	58.7%
LA PALMA	107	13	13	22	59	24.2%	75.8%
LAGUNA BEACH	389	62	104	70	153	42.7%	57.3%
LOS ALAMITOS - R	399	69	88	88	154	39.5%	60.6%
MISSION VIEJO - M	4,644	734	529	1,036	2,345	27.2%	72.8%
NEWPORT B - R	2,062	298	409	359	996	34.3%	65.7%
ORANGE	3,544	597	806	758	1,383	39.6%	60.4%
PLACENTIA - R	919	133	154	196	435	31.3%	68.7%
SAN CLEMENTE - R	3,237	501	749	723	1,264	38.6%	61.4%
SAN JUAN CAP	983	157	198	228	401	36.1%	63.9%
SANTA ANA	5,631	818	1,230	1,558	2,025	36.4%	63.6%
SEAL BEACH	367	46	91	81	149	37.3%	62.6%
STANTON	851	123	173	247	307	34.8%	65.2%
TUSTIN - R	2,085	390	488	484	724	42.1%	57.9%
VILLA PARK	16	1	1	2	12	15.4%	84.6%
WESTMINSTER - R	1,306	205	282	302	517	37.4%	62.7%
YORBA LINDA	2,569	304	319	551	1,396	24.2%	75.8%
UNINCORPORATED-R*	24,976	3,612	5,125	5,118	11,121	35.0%	65.0%
COUNTY TOTAL	93,320	14,042	18,138	20,380	40,761	34.5%	65.5%
		15.0%	19.4%	21.8%	43.7%		

\* (includes the Dana Point housing need of 2,526 units)



TABLE 9A - RIVERSIDE COUNTY

## ADVISORY FUTURE HOUSING NEEDS BY INCOME CATEGORY

(25% IMPACTION AVOIDANCE ADJUSTMENT AND FURTHER ADJUSTMENT FOR HIGHLY IMPACTED LOCALITIES)

JURISDICTION	TOTAL	VL INC	LOW INC	MOD INC	HIGH INC	LOWER INC (%VL & L)	HIGHER INC (%MOD & UP)
BANNING - R	3,518	500	832	750	1,436	37.9%	62.1%
BEAUMONT	444	72	101	100	171	38.9%	61.0%
BLYTHE	213	37	55	38	84	43.0%	57.0%
CATHEDRAL CITY	5,431	1,010	1,281	949	2,191	42.2%	57.8%
COACHELLA	600	126	128	150	196	42.4%	57.6%
CORONA	3,465	485	640	572	1,768	32.5%	67.5%
DESERT HOT SPGS	1,622	256	363	412	589	38.2%	61.7%
HEMET	3,319	595	756	868	1,100	40.7%	59.3%
INDIAN WELLS	310	31	38	27	214	22.2%	77.8%
INDIO	2,899	532	690	559	1,118	42.2%	57.9%
LA QUINTA	1,262	206	200	231	625	32.2%	67.8%
LAKE ELSINORE	1,629	257	479	366	526	45.2%	54.8%
MORENO VALLEY	17,741	3,375	4,023	3,287	7,056	41.7%	58.3%
MORCO	286	34	43	41	168	27.0%	73.0%
PALM DESERT	1,964	303	367	340	954	34.1%	65.9%
PALM SPRINGS	2,844	533	649	446	1,217	41.6%	58.5%
PERRIS - R	7,509	1,306	1,813	1,771	2,617	41.5%	58.4%
RANCHO MIRAGE	678	112	118	93	355	34.0%	66.0%
RIVERSIDE	8,219	1,347	1,721	1,448	3,704	37.3%	62.7%
SAN JACINTO	2,377	347	658	518	854	42.3%	57.7%
UNINCORPORATED	22,517	4,284	5,106	4,171	8,956	41.7%	58.3%
COUNTY TOTAL	88,847	15,748 17.7%	20,061 22.6%	17,138 19.3%	35,898 40.4%	40.3%	59.7%

TABLE 10A - SAN BERNARDINO COUNTY

## ADVISORY FUTURE HOUSING NEEDS BY INCOME CATAGORY

(25% IMPACTION AVOIDANCE ADJUSTMENT AND FURTHER ADJUSTMENT FOR HIGHLY IMPACTED LOCALITIES)

JURISDICTIONS	TOTAL	VL INC	LOW INC	MOD INC	HIGH INC	LOWER INC (%VL & L)	HIGHER INC (%MOD & UP)
ADELANTO	680	109	202	176	192	45.8%	54.2%
BARSTOW	841	132	190	189	330	38.3%	61.8%
BIG BEAR LAKE	784	116	205	131	332	41.0%	59.0%
CHINO	2,447	288	392	439	1,329	27.8%	72.3%
COLTON	3,326	505	693	803	1,326	36.0%	64.0%
FONTANA	6,640	1,004	1,590	1,285	2,761	39.1%	60.9%
GRAND TERRACE	575	72	83	100	321	26.9%	73.1%
HESPIRA - N	1822	435	215	268	904	35.7%	64.3%
HIGHLAND - N	1377	266	205	260	646	34.2%	65.8%
LOMA LINDA	882	136	194	193	358	37.5%	62.5%
MONCLAIR	630	99	136	132	263	37.2%	62.8%
NEEDLES	291	51	74	42	123	43.2%	56.8%
ONTARIO	6,385	1,009	1,333	1,303	2,741	36.7%	63.3%
RANCHO CUCAMONGA	9,445	1,103	1,242	1,707	5,393	24.8%	75.2%
REDLANDS	3,981	593	882	726	1,781	37.1%	63.0%
RIALTO	5,264	803	1,011	1,026	2,424	34.5%	65.5%
SAN BERNARDINO	8,021	1,159	1,865	1,799	3,198	37.7%	62.3%
29 PALMS - N	768	223	118	170	257	44.4%	55.6%
UPLAND	3,618	501	668	662	1,786	32.3%	67.7%
VICTORVILLE	3,542	620	863	718	1,342	41.9%	58.2%
UNINCORPORATED - R	31,123	5,329	8,105	6,148	11,541	43.2%	56.8%
COUNTY TOTAL	92,443	14,552 15.7%	20,267 21.9%	18,276 19.8%	39,348 42.6%	37.7%	62.3%

## TABLE 11A - VENTURA COUNTY

## ADVISORY FUTURE HOUSING NEEDS BY INCOME CATAGORY

(25% IMPACTION AVOIDANCE ADJUSTMENT AND FURTHER ADJUSTMENT FOR HIGHLY IMPACTED LOCALITIES)

JURISDICTION	TOTAL	VL INC	LOW INC	MOD INC	HIGH INC	LOWER INC (%VL & L)	HIGHER INC (%MOD & UP)
CAMARILLO	2,809	431	524	592	1,261	34.0%	66.0%
FILLMORE	320	43	67	86	124	34.3%	65.7%
MOORPARK - R	3,450	559	648	888	1,355	35.0%	65.0%
OJAI - R	141	17	28	41	55	32.1%	67.9%
OXNARD	3,926	672	878	993	1,383	39.5%	60.5%
PORT HUENEME	604	96	114	177	218	34.7%	65.3%
SAN BUENAVENTURA	3,889	660	986	843	1,400	42.3%	57.7%
SANTA PAULA - R	619	83	138	187	211	35.7%	64.3%
SIMI VALLEY	4,685	600	679	1,047	2,359	27.3%	72.7%
THOUSAND OAKS	5,573	789	879	1,083	2,823	29.9%	70.1%
UNINCORPORATED - R	2,878	485	663	570	1,160	39.9%	60.1%
COUNTY TOTAL - R	28,895	4,433 15.3%	5,605 19.4%	6,507 22.5%	12,350 42.7%	34.7%	65.3%

TABLE 12A - IMPERIAL COUNTY

## ADVISORY FUTURE HOUSING NEEDS BY INCOME CATEGORY

(25% IMPACTION AVOIDANCE ADJUSTMENT AND FURTHER ADJUSTMENT FOR HIGHLY IMPACTED LOCALITIES)

JURISDICTION	TOTAL	VL INC	LOW INC	MOD INC	HIGH INC	LOWER INC (%VL & L)	HIGHER INC (%MOD & UP)
BRAWLEY	337	54	82	61	139	40.5%	59.5%
CALEXICO	726	135	151	158	282	39.3%	60.7%
CALIPATRIA	49	11	10	11	17	43.3%	56.7%
EL CENTRO	1,025	161	216	191	457	36.8%	63.3%
HOLTVILLE	84	12	15	17	40	32.2%	67.8%
IMPERIAL	209	32	41	50	86	35.0%	65.0%
WESTMORELAND	35	7	8	7	12	43.5%	56.5%
UNINCORPORATED	1,110	202	268	200	440	42.4%	57.6%
COUNTY TOTAL	3,575	616	790	696	1,474	39.3%	60.7%
		17.2%	22.1%	19.5%	41.2%		

TABLE 13A - COUNTY SUMMARY

ADVISORY FUTURE HOUSING NEEDS BY INCOME CATEGORY - 7/89 TO 7/94 (ADJUSTED)

(25% IMPACTION AVOIDANCE ADJUSTMENT AND FURTHER ADJUSTMENT FOR HIGHLY IMPACTED LOCALITIES)

COUNTY	FUTURE NEED	VL INC	LOW INC	MOD INC	UP INC	LOWER INCOME (%VL & L)	HIGHER INC (%MOD & UP)
LOS ANGELES - R	269,165	40,877	58,841	51,674	117,775	37.0%	63.0%
ORANGE - R	93,320	14,042	18,138	20,380	40,761	34.5%	65.5%
VENTURA - R	28,895	4,433	5,605	6,507	12,350	34.7%	65.3%
SAN BERNARDINO	92,443	14,552	20,267	18,276	39,348	37.7%	62.3%
RIVERSIDE - R	88,847	15,748	20,061	17,138	35,898	40.3%	59.7%
IMPERIAL	3,575	616	790	696	1,474	39.3%	60.7%
REGION - R	576,244	90,268 15.7%	123,703 21.5%	114,670 19.9%	247,606 43.0%	37.1%	62.9%

TABLE 14A  
ADVISORY RHNA FUTURE NEEDS FACTORS      LOS ANGELES COUNTY

JURISDICTION	FIVE YEAR 7/89-7/94 FUTURE NEED	HOUSEHOLD GROWTH 7/89-7/94	TOTAL VACANCY ADJUSTMENT	DEMOLITION ADJUSTMENT
AGOURA HILLS	1,650	1,654	-16	12
ALHAMBRA	1,857	1,151	284	422
ARCADIA - R	804	500	132	172
ARTESIA	209	98	49	62
AVALON	218	189	7	22
AZUSA	1,492	1,101	83	308
BALDWIN PARK - R	626	358	17	252
BELL	207	25	109	73
BELLFLOWER	2,103	1,668	194	242
BELL GARDENS	104	18	24	62
BEVERLY HILLS-R	835	470	213	152
BRADBURY	26	18	2	5
BURBANK - R	2,970	2,175	115	680
CARSON	1,828	1,565	197	67
CERRITOS	1,420	1,245	149	25
CLAREMONT	756	668	62	25
COMMERCE - R	86	0	0	86
COMPTON	2,195	1,328	218	648
COVINA - R	976	743	141	92
CUDAHY	232	142	40	50
CULVER CITY	1,065	762	275	28
DOWNEY	1,467	1,005	269	193
DUARTE	927	791	91	45
EL MONTE	2,011	1,527	321	163
EL SEGUNDO - R	1,112	844	114	153
GARDENA	1,705	1,294	148	263
GLENDALE - R	5,600	4,048	640	912
GLENORA	1,159	980	94	85
HAWAIIAN GARDENS	488	367	43	78
HAWTHORNE	4,659	2,468	416	1,775
HERMOSA BEACH-R	513	161	104	248
HIDDEN HILLS	45	42	1	2
HUNTINGTON PARK	1,051	139	176	735
INDUSTRY	94	86	3	5
INGLEWOOD	1,463	705	81	677
IRVINDALE	33	15	0	18
LA CANADA FL.-R	267	198	60	8
LA HABRA HGTS-R	110	93	12	5
LAKESWOOD	982	748	209	25
LA MIRADA	937	792	141	3
LANCASTER	11,559	10,980	523	57
LA PUENTE	366	248	74	43



TABLE 14A  
ADVISORY RHNA FUTURE NEEDS FACTORS      LOS ANGELES COUNTY

JURISDICTION	FIVE YEAR 7/89-7/94 FUTURE NEED	HOUSEHOLD GROWTH 7/89-7/94	TOTAL VACANCY ADJUSTMENT	DEMOLITION ADJUSTMENT
LA VERNE	912	855	43	15
LAWNDALE	1,018	778	33	207
LOMITA	589	418	86	85
LONG BEACH	11,732	9,479	996	1,257
LOS ANGELES	113,742	82,501	18,347	12,895
LYNWOOD	405	225	55	125
MANHATTAN B.-R	1,088	645	19	423
MAYWOOD	197	42	97	58
MONROVIA	928	715	9	205
MONTEBELLO	683	294	278	112
MONTEREY PARK-R	900	483	187	230
NORWALK	1,243	988	185	70
PALMDALE - R	9,761	10,058	-318	22
PALOS VERDES EST	301	278	18	5
PARAMOUNT	1,322	1,044	99	178
PASADENA	2,989	1,979	466	543
PICO RIVERA - R	595	370	123	102
POMONA - R	2,097	1,972	-72	197
RANCHO P.V. - R	502	430	68	3
REDONDO BEACH-R	3,029	1,825	281	923
ROLLING HILLS	39	25	1	13
ROLLING H. ES.-R	30	22	5	3
ROSEMEAD	720	399	64	257
SAN DIMAS	1,242	1,152	90	0
SAN FERNANDO	278	220	35	23
SAN GABRIEL	828	592	72	165
SAN MARINO - R	32	2	28	2
SANTA FE SPRINGS	260	200	49	12
SANTA MONICA	2,378	1,338	897	143
SIERRA MADRE	159	108	17	33
SIGNAL HILL - R	419	354	33	32
SOUTH EL MONTE	403	260	56	87
SOUTH GATE	660	88	242	330
SOUTH PASADENA	317	186	81	50
SANTA CLARITA-N	6,400	5,774	475	152
TEMPLE CITY	378	282	32	65
TORRANCE	3,536	2,659	720	157
VERNON - R	0	0	0	0
WALNUT	1,403	1,369	24	10
WEST COVINA - R	1,151	941	167	43
WEST HOLLYWOOD-R	667	206	444	17
WESTLAKE VILLAGE	465	448	15	2
WHITTIER	1,294	780	317	197
UNINCORPORATED	33,865	29,668	3,023	1,173
TOTAL IN COUNTY	269,167	205,864	33,704	29,598

TABLE 15A  
ADVISORY RHNA FUTURE NEEDS FACTORS      ORANGE COUNTY

JURISDICTION	FIVE YEAR 7/89-7/94 FUTURE NEED	HOUSEHOLD GROWTH 7/89-7/94	TOTAL VACANCY ADJUSTMENT	DEMOLITION ADJUSTMENT
ANAHEIM	6,936	5,562	915	458
BREA - R	1,599	1,372	116	112
BUENA PARK - R	1,062	756	228	78
COSTA MESA - R	3,963	3,467	421	75
CYPRESS	694	562	113	20
FOUNTAIN VALLEY	692	655	33	5
FULLERTON-R	1,394	970	351	73
GARDEN GROVE	2,507	1,786	454	267
	0			
HUNTINGTON B.-R	6,228	5,360	729	138
IRVINE - R	13,187	12,673	512	2
LA HABRA	973	768	135	70
LA PALMA	107	66	41	0
LAGUNA BEACH	389	284	50	55
LOS ALAMITOS - R	399	266	53	80
NEWPORT BEACH-R	2,061	1,774	-77	365
ORANGE	3,544	3,021	368	155
PLACENTIA-R	919	822	78	18
SAN CLEMENTE-R	3,237	2,927	275	35
MISSION VIEJO-N	4,643	4,453	176	14
SAN JUAN CAP	983	899	80	3
SANTA ANA	5,631	4,211	445	975
SEAL BEACH	367	270	34	63
STANTON	851	685	126	40
TUSTIN - R	2,084	1,751	266	67
VILLA PARK	16	8	7	2
WESTMINSTER-R	1,305	975	249	82
YORBA LINDA	2,569	2,496	35	38
UNINC. COUNTY-R	22,457	21,496	879	82
DANA POINT - N	2,519	2,412	99	9
TOTAL IN COUNTY	93,319	82,745	7,192	3,382

TABLE 16A  
ADVISORY RHNA FUTURE NEEDS FACTORS      RIVERSIDE COUNTY

JURISDICTION	FIVE YEAR 7/89-7/94 FUTURE NEED	HOUSEHOLD GROWTH 7/89-7/94	TOTAL VACANCY ADJUSTMENT	DEMOLITION ADJUSTMENT
BANNING-R	3,515	3,383	97	35
BEAUMONT	444	416	12	15
BLYTHE	213	127	6	80
CATHEDRAL CITY*	5,417	5,245	172	0
COACHELLA	600	528	60	12
CORONA	3,465	3,250	139	77
DESERT HOT SPGS	1,622	1,564	52	7
HEMET	3,319	3,175	111	33
INDIAN WELLS*	432	418	12	2
INDIO	2,899	2,776	103	20
LA QUINTA	1,263	1,235	29	0
LAKE ELSINORE	1,629	1,565	52	12
MORENO VALLEY	17,742	17,410	317	15
NORCO	286	495	-209	0
PALM DESERT*	1,895	1,824	52	18
PALM SPRINGS	2,844	2,742	96	7
PERRIS-R	7,509	7,228	249	32
RANCHO MIRAGE*	639	584	15	40
RIVERSIDE	8,213	8,730	-857	340
SAN JACINTO	2,377	2,253	101	23
UNINCORPORATED	22,517	21,589	678	250
TOTAL IN COUNTY	88,840	86,538	1,286	1,017

\*Changed as part of Indian Wells Correction

TABLE 17A  
ADVISORY FUTURE NEEDS FACTORS                      SAN BERNARDINO COUNTY

JURISDICTION	FIVE YEAR 7/89-7/94 FUTURE NEED	HOUSEHOLD GROWTH 7/89-7/94	TOTAL VACANCY ADJUSTMENT	DEMOLITION ADJUSTMENT
ADELANTO	680	653	26	2
BARSTOW	841	772	60	8
BIG BEAR LAKE	785	722	18	45
CHINO	2,448	2,462	-126	112
COLTON	3,325	3,421	-125	30
FONTANA	6,640	6,509	33	98
GRAND TERRACE	575	658	-84	0
LOMA LINDA	882	853	27	2
MONTCLAIR	630	581	43	7
NEEDLES	291	268	15	8
ONTARIO	6,385	6,647	-359	97
RANCHO CUCAMONGA	9,445	9,057	374	15
REDLANDS	3,981	4,027	-109	63
RIALTO	5,260	5,377	-150	33
SAN BERNARDINO	8,021	8,838	-1,210	393
UPLAND	3,618	3,467	131	20
VICTORVILLE	3,541	3,602	-85	25
HESPERIA - N	1,822	2,006	-184	0
HIGHLAND - N	1,377	1,517	-140	0
TWENTY-NINE P.-N	767	940	-173	0
UNINCORPORATED	31,126	30,315	811	0
TOTAL IN COUNTY	92,441	92,691	-1,208	958

TABLE 18A  
ADVISORY RHNA FUTURE NEEDS FACTORS      VENTURA COUNTY

JURISDICTION	FIVE YEAR 7/89-7/94 FUTURE NEED	HOUSEHOLD GROWTH 7/89-7/94	TOTAL VACANCY ADJUSTMENT	DEMOLITION ADJUSTMENT
CAMARILLO	2,811	2,598	181	32
FILLMORE	320	269	26	25
MOORPARK-R	3,453	3,442	6	5
OJAI - R	141	112	21	8
OXNARD	3,926	3,341	536	48
PORT HUENEME	604	540	59	5
SAN BUENAVENTURA	3,889	3,507	338	43
SANTA PAULA-R	619	487	95	37
SIMI VALLEY	4,685	4,285	361	38
THOUSAND OAKS	5,573	5,204	327	42
UNINC. COUNTY-R	2,878	2,576	214	88
TOTAL IN COUNTY	28,898	26,361	2,165	372

TABLE 19A  
ADVISORY RHNA FUTURE NEEDS FACTORS      IMPERIAL COUNTY

JURISDICTION	FIVE YEAR 7/89-7/94 FUTURE NEED	HOUSEHOLD GROWTH 7/89-7/94	TOTAL VACANCY ADJUSTMENT	DEMOLITION ADJUSTMENT
BRAWLEY	337	385	-61	14
CALEXICO	725	655	59	12
CALIPATRIA	49	46	1	2
EL CENTRO	1,025	1,172	-170	24
HOLTVILLE	84	92	-12	4
IMPERIAL	209	209	-3	3
WESTMORELAND	35	33	1	1
UNINCORPORATED	1,110	1,032	54	24
TOTAL IN COUNTY	3,575	3,624	-132	83



TABLE 20A

ADVISORY FUTURE NEEDS FACTORS                      COUNTY SUMMARY

COUNTY	FIVE YEAR 7/89-7/94 FUTURE NEED	HOUSEHOLD GROWTH 7/89-7/94	TOTAL VACANCY ADJUSTMENT	DEMOLITION ADJUSTMENT
LOS ANGELES	269,167	205,864	33,704	29,598
ORANGE	93,319	82,745	7,192	3,382
RIVERSIDE	88,840	86,538	1,286	1,017
SAN BERNARDINO	92,441	92,691	-1,208	958
VENTURA	28,898	26,361	2,165	372
IMPERIAL	3,575	3,624	-132	83
REGION	576,240	497,822	43,007	35,410

TABLE 21A  
ADVISORY RHNA FUTURE NEEDS FOR  
JAN. 1988 - JUNE 1989 "GAP" PERIOD

LOS ANGELES		LOS ANGELES	
JURISDICTION		JURISDICTION	
AGOURA HILLS	512	LA VERNE	268
ALHAMBRA	484	LAWDALE	303
ARCADIA - R	206	LOMITA	155
ARTESIA	49	LONG BEACH	3,325
AVALON	65	LOS ANGELES	29,515
AZUSA	435	LYNWOOD	107
BALDWIN PARK - R	186	MANHATTAN B.-R	326
BELL	30	MAYWOOD	30
BELLFLOWER	590	MONROVIA	283
BELL GARDENS	24	MONTEBELLO	125
BEVERLY HILLS-R	192	MONTEREY PARK-R	218
BRADBURY	7	NORWALK	326
BURBANK - R	879	PALMDALE - R	3,119
CARSON	502	PALOS VERDES EST	87
CERRITOS	390	PARAMOUNT	377
CLAREMONT	213	PASADENA	777
COMMERCE - R	26	PICO RIVERA - R	144
COMPTON	605	POMONA - R	669
COVINA - R	257	RANCHO P.V. - R	133
CUDAHY	59	REDONDO BEACH-R	845
CULVER CITY	245	ROLLING HILLS	12
DOWNEY	369	ROLLING H. ES.-R	8
DUARTE	258	ROSEMEAD	200
EL MONTE	522	SAN DIMAS	355
EL SEGUNDO - R	308	SAN FERNANDO	75
GARDENA	481	SAN GABRIEL	233
GLENDALE - R	1,534	SAN MARINO - R	1
GLENDDORA	327	SANTA FE SPRINGS	65
HAWAIIAN GARDENS	137	SANTA MONICA	462
HAWTHORNE	1,302	SIERRA MADRE	43
HERMOSA BEACH-R	125	SIGNAL HILL - R	120
HIDDEN HILLS	13	SOUTH EL MONTE	106
HUNTINGTON PARK	264	SOUTH GATE	126
INDUSTRY	28	SOUTH PASADENA	73
INGLEWOOD	423	SANTA CLARITA-N	1,826
IRWINDALE	10	TEMPLE CITY	106
LA CANADA FL.-R	63	TORRANCE	871
LA HABRA HGTS-R	30	VERNON - R	0
LAKEWOOD	238	WALNUT	422
LA MIRADA	245	WEST COVINA - R	303
LANCASTER	3,415	WEST HOLLYWOOD-R	70
LA PUENTE	90	WESTLAKE VILLAGE	139
		WHITTIER	300
		UNINCORPORATED	9,504
		TOTAL IN COUNTY	72,687

TABLE 21A  
ADVISORY RHNA FUTURE NEEDS FOR  
JAN. 1988 - JUNE 1989 "GAP" PERIOD

ORANGE COUNTY		RIVERSIDE	
JURISDICTION	1/88-7/89 NEED		
ANAHEIM	1,865	BANNING-R	1,055
BREA - R	458	BEAUMONT	133
BUENA PARK - R	257	BLYTHE	63
COSTA MESA - R	1,100	CATHEDRAL CITY*	1,625
CYPRESS	179	COACHELLA	167
FOUNTAIN VALLEY	203	CORONA	1,027
FULLERTON-R	322	DESERT HOT SPGS	487
GARDEN GROVE	633	HEMET	996
		INDIAN WELLS*	130
HUNTINGTON B.-R	1,701	INDIO	870
IRVINE - R	3,910	LA QUINTA	379
LA HABRA	259	LAKE ELSINORE	489
LA PALMA	20	MORENO VALLEY	5,355
LAGUNA BEACH	104	NORCO	152
LOS ALAMITOS - R	107	PALM DESERT*	568
NEWPORT BEACH-R	659	PALM SPRINGS	853
ORANGE	980	PERRIS - R	2,251
PLACENTIA-R	259	RANCHO MIRAGE*	192
SAN CLEMENTE-R	917	RIVERSIDE	2,800
MISSION VIEJO-N	1,383	SAN JACINTO	707
SAN JUAN CAP	278	UNINCORPORATED	6,755
SANTA ANA	1,599		
SEAL BEACH	103	TOTAL IN COUNTY	27,052
STANTON	225		
TUSTIN - R	566		
VILLA PARK	3		
WESTMINSTER-R	326		
YORBA LINDA	777		
UNINC. COUNTY-R	6,667		
DANA POINT - N	726		
TOTAL IN COUNTY	26,586		

\*Changed as part of Indian Wells Correction



TABLE 21A

ADVISORY RHNA FUTURE NEEDS FOR  
JAN. 1988 - JUNE 1989 "GAP" PERIOD

## SAN BERNARDINO

## JURISDICTION

ADELANTO	204
BARSTOW	241
BIG BEAR LAKE	236
CHINO	793
COLTON	1,069
FONTANA	2,039
GRAND TERRACE	203
LOMA LINDA	265

MONTCLAIR	182
NEEDLES	85
ONTARIO	2,085
RANCHO CUCAMONGA	2,797
REDLANDS	1,263
RIALTO	1,666
SAN BERNARDINO	2,853
UPLAND	1,078
VICTORVILLE	1,123

HESPERIA - N	617
HIGHLAND - N	468
TWENTY-NINE P.-N	289
UNINCORPORATED	9,338

TOTAL IN COUNTY	28,893
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## IMPERIAL COUNTY

## JURISDICTION

## 1/88-7/89 NEED

BRAWLEY	119
CALEXICO	202
CALIPATRIA	14
EL CENTRO	363
HOLTVILLE	29
IMPERIAL	65
WESTMORELAND	10
UNINCORPORATED	320

TOTAL IN COUNTY	1,122
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## COUNTY SUMMARY

## COUNTY

## 1/88-7/89 NEED

LOS ANGELES	72,687
ORANGE	26,586
RIVERSIDE	27,052
SAN BERNARDINO	28,893
VENTURA	8,240
IMPERIAL	1,122

REGION	164,580
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## VENTURA

## JURISDICTION

CAMARILLO	810
FILLMORE	91
MOORPARK - R	1,061
OJAI - R	37
OXNARD	1,049
PORT HUENEME	169
SAN BUENAVENTURA	1,098
SANTA PAULA-R	162
SIMI VALLEY	1,330
THOUSAND OAKS	1,615
UNINC. COUNTY-R	819

TOTAL IN COUNTY	8,240
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TABLE 22A  
ADVISORY RHNA HOUSEHOLD GROWTH  
LOS ANGELES COUNTY

JURISDICTION	TOTAL JAN 1988 (DOF)	HOUSEHOLDS JULY 1994 (ADJUSTED)	HOUSEHOLD GROWTH 7/89-7/94
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AGOURA HILLS	6,039	8,189	1,654
ALHAMBRA	27,841	29,337	1,151
ARCADIA-R	18,556	19,206	500
ARTESIA	4,417	4,544	98
AVALON	1,082	1,328	189
AZUSA	12,374	13,805	1,101
BALDWIN PARK-R	16,236	16,701	358
BELL	8,755	8,787	25
BELLFLOWER	23,151	25,319	1,668
BELL GARDENS	9,210	9,234	18
BEVERLY HILLS	15,360	15,971	470
BRADBURY	296	320	18
BURBANK	38,558	41,385	2,175
CARSON	23,831	25,865	1,565
CERRITOS	15,233	16,852	1,245
CLAREMONT	10,775	11,644	668
COMMERCE-R	3,172	3,172	0
COMPTON	23,195	24,922	1,328
COVINA-R	15,710	16,676	743
CUDAHY	5,357	5,542	142
CULVER CITY	16,556	17,546	762
DOWNEY	33,472	34,778	1,005
DUARTE	6,646	7,674	791
EL MONTE	26,408	28,393	1,527
EL SEGUNDO	6,795	7,892	844
GARDENA	18,200	19,882	1,294
GLENDALE	64,312	69,574	4,048
GLENDORA	15,789	17,063	980
HAWAIIAN GARDENS	3,343	3,820	367
HAWTHORNE	26,713	29,921	2,468
HERMOSA BEACH-R	9,578	9,787	161
HIDDEN HILLS	510	565	42
HUNTINGTON PARK	14,477	14,658	139
INDUSTRY	84	196	86
INGLEWOOD	37,045	37,962	705
IRWINDALE	238	258	15
LA CANADA FLNTRG	6,853	7,111	198
LA HABRA HEIGHTS	1,624	1,745	93
LAKEWOOD	26,340	27,313	748
LA MIRADA	12,447	13,477	792
LANCASTER	28,036	42,310	10,980
LA PUENTE	8,740	9,063	248



TABLE 22A			
ADVISORY RHNA HOUSEHOLD GROWTH			
LOS ANGELES COUNTY			
JURISDICTION	TOTAL JAN 1988 (DOF)	HOUSEHOLDS JULY 1994 (ADJUSTED)	HOUSEHOLD GROWTH 7/89-7/94
LA VERNE	9,890	11,001	855
LAWDALE	9,020	10,032	778
LOMITA	8,144	8,687	418
LONG BEACH	163,432	175,755	9,479
LOS ANGELES	1,222,354	1,329,605	82,501
LYNWOOD	14,097	14,390	225
MANHATTAN B.-R	14,383	15,222	645
MAYWOOD	6,533	6,587	42
MONROVIA	12,822	13,751	715
MONTEBELLO	18,268	18,650	294
MONTEREY PARK-R	19,227	19,855	483
NORWALK	25,827	27,112	988
PALMDALE	14,443	27,518	10,058
PALOS VERDES EST	5,000	5,362	278
PARAMOUNT	12,351	13,708	1,044
PASADENA	49,115	51,688	1,979
PICO RIVERA-R	15,641	16,122	370
POMONA-R	35,836	38,400	1,972
RANCHO P.V.-R	15,002	15,561	430
REDONDO BEACH-R	27,383	29,756	1,825
ROLLING HILLS	646	678	25
ROLLING H. ES.-R	2,657	2,686	22
ROSEMEAD	13,684	14,203	399
SAN DIMAS	10,230	11,728	1,152
SAN FERNANDO	5,671	5,957	220
SAN GABRIEL	11,941	12,710	592
SAN MARINO	4,415	4,418	2
SANTA FE SPRINGS	4,432	4,692	200
SANTA MONICA	45,741	47,480	1,338
SIERRA MADRE	4,679	4,820	108
SIGNAL HILL-R	3,376	3,836	354
SOUTH EL MONTE	4,676	5,014	260
SOUTH GATE	22,871	22,986	88
SOUTH PASADENA	10,259	10,501	186
SANTA CLARITA-N	34,697	42,203	5,774
TEMPLE CITY	11,210	11,576	282
TORRANCE	52,023	55,480	2,659
VERNON-R	26	26	0
WALNUT	6,443	8,223	1,369
WEST COVINA-R	29,711	30,934	941
WEST HOLLYWOOD	22,561	22,829	206
WESTLAKE VILLAGE	2,476	3,059	448
WHITTIER	27,118	28,132	780
UNINCORPORATED	289,318	327,887	29,668
TOTAL IN COUNTY	2,962,983	3,230,606	205,864

TABLE 23A			
ADVISORY RHNA HOUSEHOLD GROWTH			
JURISDICTION	ORANGE COUNTY		HOUSEHOLD GROWTH 7/89-7/94
	TOTAL JAN 1988 (DOF)	HOUSEHOLDS JULY 1994 (ADJUSTED)	
ANAHEIM	88,003	95,234	5,562
BREA	12,003	13,786	1,372
BUENA PARK - R	22,749	23,732	756
COSTA MESA - R	36,909	41,416	3,467
CYPRESS	13,718	14,448	562
FOUNTAIN VALLEY	17,315	18,166	655
FULLERTON	40,591	41,852	970
GARDEN GROVE	45,113	47,435	1,786
HUNTINGTON BEACH	68,395	75,363	5,360
IRVINE - R	36,398	52,873	12,673
LA HABRA	17,911	18,909	768
LA PALMA	4,821	4,907	66
LAGUNA BEACH	11,329	11,698	284
LOS ALAMITOS	4,286	4,632	266
NEWPORT BEACH-R	31,415	33,721	1,774
ORANGE	36,197	40,124	3,021
PLACENTIA	12,976	14,045	822
SAN CLEMENTE-R	15,874	19,679	2,927
MISSION VIEJO-N	17,148	22,937	4,453
SAN JUAN CAP	8,611	9,780	899
SANTA ANA	70,255	75,729	4,211
SEAL BEACH	13,985	14,336	270
STANTON	10,275	11,165	685
TUSTIN - R	18,194	20,470	1,751
VILLA PARK	1,867	1,877	8
WESTMINSTER	25,117	26,384	975
YORBA LINDA	14,436	17,681	2,496
UNINC. COUNTY-R	106,098	137,178	21,496
DANA POINT - N			2,412
COUNTY TOTAL - R	801,989	909,557	82,745

TABLE 26A			
ADVISORY RHNA HOUSEHOLD GROWTH			
VENTURA COUNTY			
JURISDICTION	TOTAL JAN 1988 (DOF)	HOUSEHOLDS JULY 1994 (ADJUSTED)	HOUSEHOLD GROWTH 7/89-7/94
CAMARILLO	17,318	20,696	2,598
FILLMORE	3,341	3,691	269
MOORPARK - R	6,688	11,163	3,442
OJAI - R	2,900	3,046	112
OXNARD	38,134	42,477	3,341
PORT HUENEME	6,754	7,456	540
SAN BUENAVENTURA	35,093	39,652	3,507
SANTA PAULA - R	7,717	8,350	487
SIMI VALLEY	29,209	34,780	4,285
THOUSAND OAKS	34,408	41,173	5,204
UNINC. COUNTY-R	27,818	31,167	2,576
TOTAL IN COUNTY	209,380	243,650	26,361

TABLE 27A			
ADVISORY RHNA HOUSEHOLD GROWTH			
JURISDICTION	IMPERIAL COUNTY		
	TOTAL JAN 1988 (DOF)	HOUSEHOLDS JULY 1994 (GMA-4M)	HOUSEHOLD GROWTH 7/89-7/94
BRAWLEY	5,482	5,982	385
CALEXICO	4,518	5,369	655
CALIPATRIA	719	779	46
EL CENTRO	9,139	10,662	1,172
HOLTVILLE	1,414	1,534	92
IMPERIAL	1,281	1,553	209
WESTMORELAND	528	571	33
UNINCORPORATED	9,109	10,451	1,032
COUNTY TOTAL	32,190	36,901	3,624

TABLE 28A			
ADVISORY RHNA HOUSEHOLD GROWTH			
COUNTY SUMMARY			
COUNTY	TOTAL JAN 1988 (DOF)	HOUSEHOLDS JULY 1994 (ADJUSTED)	HOUSEHOLD GROWTH 7/89-7/94
LOS ANGELES	2,962,983	3,230,606	205,864
ORANGE	801,989	909,557	82,745
RIVERSIDE	335,701	448,200	86,538
SAN BERNARDINO	427,801	548,299	92,691
VENTURA	209,380	243,650	26,361
IMPERIAL	32,190	36,901	3,624
REGION	4,770,044	5,417,213	497,822

TABLE 29A  
ADVISORY RHNA VACANCY ADJUSTMENT  
LOS ANGELES COUNTY

JURISDICTION	TTL 1/88 HOUSING UNITS	SNGL FAM PROPOR. 1/88	1988 IDEAL VAC. R	1987 ACTUAL VAC. R.	EXISTING VAC NEED 1988	ADDTL VAC NEED 89-94	TOTAL VACANCY ADJSTMNT
AGOURA HILLS	6,301	0.834	2.50	3.40	-57	41	-16
ALHAMBRA	29,195	0.478	3.57	1.90	243	41	284
ARCADIA - R	19,180	0.627	3.12	1.90	117	16	132
ARTESIA	4,604	0.756	2.73	0.70	47	3	49
AVALON-V	1,624	0.403	3.79	9.50	0	7	7
AZUSA	12,691	0.473	3.58	2.90	43	39	83
BALDWIN PARK-R	16,636	0.772	2.68	2.60	7	10	17
BELL	9,332	0.428	3.71	1.40	108	1	109
BELLFLOWER	23,724	0.546	3.36	2.20	138	56	194
BELL GARDENS	9,512	0.702	2.89	2.40	23	1	24
BEVERLY HILLS-R	16,252	0.370	3.89	1.50	194	18	213
BRADBURY	320	0.947	2.16	0.90	2	0	2
BURBANK - R	40,138	0.532	3.41	3.20	41	74	115
CARSON	24,098	0.772	2.68	1.40	155	42	197
CERRITOS	15,521	0.913	2.26	0.70	121	28	149
CLAREMONT	11,219	0.831	2.51	1.70	45	17	62
COMMERCE - R	3,255	0.764	2.71	0.50	0	0	0
COMPTON	24,005	0.702	2.89	1.40	179	38	218
COVINA - R	16,030	0.642	3.07	1.60	118	23	141
CUDAHY	5,611	0.454	3.64	2.40	35	5	40
CULVER CITY	17,115	0.469	3.59	0.70	247	27	275
DOWNEY	34,081	0.602	3.19	1.80	237	32	269
DUARTE	6,826	0.699	2.90	0.90	68	23	91
EL MONTE	27,085	0.567	3.30	1.30	271	50	321
EL SEGUNDO - R	7,080	0.473	3.58	1.20	84	30	114
GARDENA	18,712	0.442	3.67	2.60	100	48	148
GLENDALE - R	67,123	0.415	3.75	2.30	488	152	640
GLENDORA	16,240	0.787	2.64	1.80	68	26	94
HAWAIIAN GARDENS	3,521	0.583	3.25	1.50	31	12	43
HAWTHORNE	27,763	0.337	3.99	1.70	318	98	416
HERMOSA BEACH-R	10,075	0.484	3.55	1.60	98	6	104
HIDDEN HILLS	526	0.958	2.13	2.00	0	1	1
HUNTINGTON PARK	15,384	0.359	3.92	1.70	171	5	176
INDUSTRY	88	0.807	2.58	1.60	0	2	3
INGLEWOOD	38,501	0.405	3.78	3.50	55	27	81
IRVINDALE	272	0.971	2.09	2.60	-1	0	0
LA CANADA FL.-R	6,971	0.931	2.21	0.60	56	4	60
LA HABRA HGTS-R	1,690	0.956	2.13	1.00	10	2	12
LAKEWOOD	26,586	0.855	2.43	1.00	191	18	209
LA MIRADA	12,866	0.837	2.49	0.60	122	20	141
LANCASTER	30,306	0.613	3.16	2.00	176	347	523
LA PUENTE	8,966	0.700	2.90	1.40	67	7	74



TABLE 29A  
ADVISORY RHNA VACANCY ADJUSTMENT  
LOS ANGELES COUNTY

JURISDICTION	TTL 1/88 HOUSING UNITS	SNGL FAM PROPOR. 1/88	1988 IDEAL VAC. R	1987 ACTUAL VAC. R.	EXISTING VAC NEED 1988	ADDTL VAC NEED 89-94	TOTAL VACANCY ADJSTMNT
LA VERNE	10,394	0.687	2.94	2.60	18	25	43
LAWDALE	9,425	0.638	3.08	2.90	9	24	33
LOMITA	8,544	0.537	3.39	1.70	72	14	86
LONG BEACH	172,915	0.449	3.65	2.90	650	346	996
LOS ANGELES	1,267,726	0.459	3.62	1.20	15,358	2,989	18,347
LYNWOOD	14,578	0.614	3.16	2.50	48	7	55
MANHATTAN B.-R	15,309	0.759	2.72	2.70	2	18	19
MAYWOOD	6,852	0.469	3.59	0.80	96	1	97
MONROVIA	13,387	0.603	3.19	3.30	-14	23	9
MONTEBELLO	18,782	0.582	3.25	0.40	268	10	278
MONTEREY PARK-R	19,936	0.689	2.93	1.20	173	14	187
NORWALK	26,580	0.770	2.69	1.50	158	27	185
PALMDALE - R	16,935	0.617	3.15	6.90	-635	317	-318
PALOS VERDES EST	5,071	0.917	2.25	1.80	11	6	18
PARAMOUNT	12,907	0.565	3.31	2.30	65	35	99
PASADENA	51,135	0.545	3.36	1.80	400	67	466
PICO RIVERA-R	15,948	0.824	2.53	1.10	114	9	123
POMONA - R	37,009	0.652	3.04	3.40	-132	60	-72
RANCHO P.V.-R	15,303	0.817	2.55	1.80	57	11	68
REDONDO B.-R	28,404	0.433	3.70	2.20	213	68	281
ROLLING HILLS	676	0.988	2.04	1.80	1	1	1
ROLLING H. ES.-R	2,726	0.953	2.14	1.80	5	0	5
ROSEMEAD	14,187	0.783	2.65	1.90	53	11	64
SAN DIMAS	10,481	0.760	2.72	1.60	59	31	90
SAN FERNANDO	5,748	0.731	2.81	1.80	29	6	35
SAN GABRIEL	12,415	0.584	3.25	2.40	53	19	72
SAN MARINO - R	4,475	0.987	2.04	0.80	28	0	28
SANTA FE SPRINGS	4,520	0.730	2.81	0.90	43	6	49
SANTA MONICA	47,946	0.232	4.30	0.80	840	58	897
SIERRA MADRE	4,968	0.743	2.77	2.20	14	3	17
SIGNAL HILL - R	3,586	0.377	3.87	2.80	19	14	33
SOUTH EL MONTE	4,821	0.721	2.84	0.80	49	7	56
SOUTH GATE	23,636	0.593	3.22	1.20	239	3	242
SOUTH PASADENA	10,714	0.502	3.49	2.10	75	7	81
SANTA CLARITA-N	35,047	0.737	2.79	1.00	313	161	475
TEMPLE CITY	11,524	0.857	2.43	2.00	25	7	32
TORRANCE	52,898	0.569	3.29	0.90	633	88	720
VERNON - R	37	0.784	2.65	1.20	0	0	0
WALNUT	6,604	0.959	2.12	2.20	-5	29	24
WEST COVINA - R	31,063	0.732	2.80	1.90	140	26	167
WEST HOLLYWOOD-R	24,614	0.122	4.63	1.10	435	10	444
WESTLAKE VILLAGE	2,584	0.767	2.70	2.50	3	12	15
WHITTIER	28,023	0.699	2.90	0.80	295	23	317
UNINCORPOATED	305,164	0.723	2.83	1.40	2,183	840	3,023
TOTAL IN COUNTY	3,082,622	0.543	3.37	1.80	26,876	6,828	33,704

TABLE 30A  
ADVISORY RHNA VACANCY ADJUSTMENT  
ORANGE COUNTY

JURISDICTION	TTL 1/88 HOUSING UNITS	SNGL FAM PROPOR. 1/88	1988 IDEAL VAC. R	1987 ACTUAL VAC. R.	EXISTING VAC NEED 1988	ADDTL VAC NEED 89-94	TOTAL VACANCY ADJSTMNT
ANAHEIM	89,873	0.499	3.50	1.90	720	195	915
BREA - R	13,051	0.625	3.13	2.00	73	43	116
BUENA PARK - R	23,177	0.645	3.07	1.30	205	23	228
COSTA MESA - R	37,282	0.470	3.59	2.00	296	124	421
CYPRESS	13,928	0.766	2.70	1.30	98	15	113
FOUNTAIN VALLEY	17,548	0.807	2.58	2.40	16	17	33
FULLERTON - R	42,108	0.594	3.22	1.70	320	31	351
GARDEN GROVE	45,860	0.621	3.14	1.40	398	56	454
HUNTINGTON B. -R	70,179	0.603	3.19	1.60	558	171	729
IRVINE - R	36,953	0.723	2.83	2.00	154	359	512
LA HABRA	18,419	0.570	3.29	2.10	110	25	135
LA PALMA	4,888	0.794	2.62	1.00	40	2	41
LAGUNA BEACH	12,811	0.649	3.05	2.40	42	9	50
LOS ALAMITOS-R	4,365	0.558	3.33	1.30	44	9	53
NEWPORT BEACH-R	34,336	0.565	3.31	3.70	-136	59	-77
ORANGE	37,125	0.668	3.00	1.50	278	91	368
PLACENTIA - R	13,480	0.697	2.91	2.10	55	24	78
SAN CLEMENTE-R	16,916	0.590	3.23	1.10	180	95	275
MISSION VIEJO-N	17,642	0.604	3.19	2.80	34	142	176
SAN JUAN CAP	9,534	0.717	2.85	1.70	55	26	80
SANTA ANA	72,629	0.524	3.43	2.60	301	144	445
SEAL BEACH	14,486	0.424	3.73	3.40	24	10	34
STANTON	10,437	0.424	3.73	1.80	101	26	126
TUSTIN - R	18,992	0.343	3.97	1.90	197	70	266
VILLA PARK	1,889	0.988	2.04	1.30	7	0	7
WESTMINSTER-R	25,836	0.636	3.09	1.40	219	30	249
YORBA LINDA	15,170	0.924	2.23	2.50	-21	56	35
UNINC. COUNTY-R	110,492	0.666	3.00	2.40	333	645	879
DANA POINT - N			5.00		NA	NA	99
COUNTY TOTAL - R	829,406	0.604	3.19	2.10	4,697	2,495	7,192

TABLE 31A  
ADVISORY RHNA VACANCY ADJUSTMENT  
RIVERSIDE COUNTY

JURISDICTION	TTL 1/88 HOUSING UNITS	SNGL FAM PROPOR. 1/88	1988 IDEAL VAC. R	1987 ACTUAL VAC. R.	EXISTING VAC NEED 1988	ADDTL VAC NEED 89-94	TOTAL VACANCY ADJSTMNT
BANNING-V, -R	7,420	0.710	2.87	5.00	0	97	97
BEAUMONT-V	3,398	0.675	2.97	3.20	0	12	12
BLYTHE	2,710	0.733	2.80	2.60	3	4	6
CATHDRL CITY-V	11,954	0.576	3.27	7.30	0	172	172
COACHELLA	3,226	0.614	3.16	0.50	43	17	60
CORONA	18,229	0.679	2.96	2.50	42	96	139
DESERT HOT SP-V	5,136	0.565	3.30	8.60	0	52	52
HEMET-V	17,573	0.503	3.49	6.20	0	111	111
INDIAN WELLS-V*	3,061	0.696	2.91	5.60	0	12	12
INDIO-V	12,792	0.427	3.72	5.80	0	103	103
LA QUINTA-V	4,486	0.888	2.34	10.60	0	29	29
LAKE ELSINORE-V	5,928	0.562	3.31	4.00	0	52	52
MORENO VALLEY	29,345	0.855	2.43	2.80	-107	424	317
NORCO	5,831	0.958	2.13	5.90	-220	11	-209
PALM DESERT-V*	15,320	0.708	2.88	5.60	0	52	52
PALM SPRINGS-V	28,663	0.500	3.50	9.60	0	96	96
PERRIS-R	4,740	0.547	3.36	3.10	6	243	249
RANCHO MIRAGE-V*	9,014	0.783	2.65	5.50	0	15	15
RIVERSIDE	75,176	0.663	3.01	4.50	-1,120	263	-857
SAN JACINTO	5,758	0.488	3.54	2.80	21	80	101
UNINCORPORATED	140,410	0.620	3.14	4.70	0	678	678
TOTAL IN COUNTY	410,170	0.640	3.08	5.30	-1,332	2,618	1,286

\*Changed as part of Indian Wells Correction

TABLE 32A  
ADVISORY RHNA VACANCY ADJUSTMENT  
SAN BERNARDINO COUNTY

JURISDICTION	TTL 1/88 HOUSING UNITS	SNGL FAM PROPOR. 1/88	1988 IDEAL VAC. R	1987 ACTUAL VAC. R.	EXISTING VAC NEED 1988	ADDTL VAC NEED 89-94	TOTAL VACANCY ADJSTMNT
ADELANTO-V	2,391	0.356	3.93	9.40	0	26	26
BARSTOW	8,020	0.633	3.10	2.20	36	24	60
BIG BEAR LAKE-V	8,062	0.837	2.49	3.00	0	18	18
CHINO	15,213	0.728	2.82	4.10	-195	69	-126
COLTON	13,127	0.570	3.29	5.10	-238	113	-125
FONTANA	25,132	0.706	2.88	3.50	-155	188	33
GRAND TERRACE	3,779	0.786	2.64	5.31	-101	17	-84
LOMA LINDA-V	5,883	0.593	3.22	4.40	0	27	27
MONTCLAIR	8,841	0.645	3.07	2.50	25	18	43
NEEDLES	2,175	0.634	3.10	2.50	7	8	15
ONTARIO	40,315	0.633	3.10	4.50	-565	206	-359
RANCHO CUCAMONGA	31,665	0.742	2.77	2.00	122	251	374
REDLANDS	22,347	0.674	2.98	4.00	-229	120	-109
RIALTO	20,959	0.770	2.69	4.10	-295	145	-150
SAN BERNARDINO	58,571	0.614	3.16	5.70	-1,489	279	-1,210
UPLAND	24,455	0.636	3.09	2.90	24	107	131
VICTORVILLE	10,661	0.594	3.22	5.10	-201	116	-85
HESPERIA - N	8,676	0.834	2.50	5.20	-234	50	-184
HIGHLAND - N	8,178	0.686	2.94	5.20	-185	45	-140
TWENTY NINE P.-N	4,152	0.837	2.49	7.20	-196	23	-173
UNINC. - V	181,381	0.775	2.68	4.20	0	811	811
TOTAL IN COUNTY	503,983	0.711	2.87	4.30	-3,869	2,661	-1,208

TABLE 33A  
ADVISORY RHNA VACANCY ADJUSTMENT

VENTURA COUNTY							
JURISDICTION	TTL 1/88 HOUSING UNITS	SNGL FAM PROPOR. 1/88	1988 IDEAL VAC. R	1987 ACTUAL VAC. R.	EXISTING VAC NEED 1988	ADDTL VAC NEED 89-94	TOTAL VACANCY ADJSTMNT
CAMARILLO	17,758	0.780	2.66	1.40	112	69	181
FILLMORE	3,445	0.742	2.77	1.70	19	7	26
MOORPARK - R	6,835	0.806	2.58	3.80	-83	89	6
OJAI - R	2,998	0.766	2.70	1.50	18	3	21
OXNARD	39,929	0.585	3.24	1.10	428	108	536
PORT HUENEME	7,520	0.571	3.29	2.20	41	18	59
SAN BUENAVENTURA	36,240	0.614	3.16	1.90	228	111	338
SANTA PAULA-R	7,994	0.630	3.11	1.10	80	15	95
SIMI VALLEY	30,815	0.820	2.54	0.90	253	109	361
THOUSAND OAKS	35,826	0.781	2.66	1.60	189	138	327
UNINC. COUNTY-R	28,661	0.822	2.54	1.50	148	65	214
					0		
TOTAL IN COUNTY	218,021	0.715	2.85	1.50	1,433	733	2,165

TABLE 34A  
ADVISORY RHNA VACANCY ADJUSTMENT

JURISDICTION	IMPERIAL COUNTY						
	TTL 1/88 HOUSING UNITS	SNGL FAM PROPOR. 1/88	1988 IDEAL VAC. R	1987 ACTUAL VAC. R.	EXISTING VAC NEED 1988	ADDTL VAC NEED 89-94	TOTAL VACANCY ADJSTMNT
BRAWLEY	5,810	0.653	3.04	4.30	-73	12	-61
CALEXICO	4,579	0.640	3.08	1.40	38	20	59
CALIPATRIA-V	801	0.770	2.69	3.20	0	1	1
EL CENTRO	9,620	0.617	3.15	5.30	-207	37	-170
HOLTVILLE	1,497	0.662	3.01	4.00	-15	3	-12
IMPERIAL	1,301	0.736	2.79	3.50	-9	6	-3
WESTMORELAND-V	604	0.748	2.75	3.90	0	1	1
UNINCORPORATED	11,518	0.526	3.42	3.10	19	35	54
TOTAL IN COUNTY	35,730	0.608	3.17	3.80	-247	115	-132



TABLE 35A  
ADVISORY RHNA VACANCY ADJUSTMENT

JURISDICTION	COUNTY SUMMARY						
	TTL 1/88 HOUSING UNITS	SNGL FAM PROPOR. 1/88	1988 IDEAL VAC. R	1987 ACTUAL VAC. R.	EXISTING VAC NEED 1988	ADDTL VAC NEED 89-94	TOTAL VACANCY ADJSTMNT
LOS ANGELES	3,082,622	0.543	3.37	1.80	26,876	6,828	33,704
ORANGE	829,406	0.604	3.19	2.10	4,697	2,495	7,192
RIVERSIDE	410,170	0.640	3.08	5.30	-1,332	2,618	1,286
SAN BERNARDINO	503,983	0.711	2.87	4.30	-3,869	2,661	-1,208
VENTURA	218,021	0.715	2.85	1.50	1,433	733	2,165
IMPERIAL	35,730	0.608	3.17	3.80	-247	115	-132
REGION	5,079,932			2.31	27,558	15,450	43,007

TABLE 36A  
ADVISORY RHNA DEMOLITION ADJUSTMENT  
LOS ANGELES COUNTY  
1984-86

JURISDICTION	ACTUAL DEMOLITIONS	DEMOLITION ADJUSTMENT
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AGOURA HILLS	7	12
ALHAMBRA	253	422
ARCADIA	103	172
ARTESIA	37	62
AVALON	13	22
AZUSA	185	308
BALDWIN PARK	151	252
BELL	44	73
BELLFLOWER	145	242
BELL GARDENS	37	62
BEVERLY HILLS-R	168	152
BRADBURY	3	5
BURBANK - R	880	680
CARSON	40	67
CERRITOS	15	25
CLAREMONT	15	25
COMMERCE - R	44	86
COMPTON	389	648
COVINA	55	92
CUDAHY	30	50
CULVER CITY	17	28
DOWNEY	116	193
DUARTE	27	45
EL MONTE	98	163
EL SEGUNDO	92	153
GARDENA	158	263
GLENDALE - R	1,159	912
GLENDORA	51	85
HAWAIIAN GARDENS	47	78
HAWTHORNE	1,065	1,775
HERMOSA BEACH	149	248
HIDDEN HILLS	1	2
HUNTINGTON PARK	441	735
INDUSTRY	3	5
INGLEWOOD	406	677
IRWINDALE	11	18
LA CANADA FLNTRG	5	8
LA HABRA HEIGHTS	3	5
LAKESWOOD	15	25
LA MIRADA	2	3
LANCASTER	34	57
LA PUENTE	26	43

TABLE 36A  
ADVISORY RHNA DEMOLITION ADJUSTMENT  
LOS ANGELES COUNTY  
1984-86

JURISDICTION	ACTUAL DEMOLITIONS	DEMOLITION ADJUSTMENT
LA VERNE	9	15
LAWDALE	124	207
LOMITA	51	85
LONG BEACH	754	1,257
LOS ANGELES	7,737	12,895
LYNWOOD	75	125
MANHATTAN BEACH	254	423
MAYWOOD	35	58
MONROVIA	123	205
MONTEBELLO	67	112
MONTEREY PARK	138	230
NORWALK	42	70
PALMDALE	13	22
PALOS VERDES EST	3	5
PARAMOUNT	107	178
PASADENA	326	543
PICO RIVERA	61	102
POMONA	118	197
RANCHO P. VERDES	2	3
REDONDO BEACH	554	923
ROLLING HILLS	8	13
ROLLING HILLS ES	2	3
ROSEMEAD	154	257
SAN DIMAS	0	0
SAN FERNANDO	14	23
SAN GABRIEL	99	165
SAN MARINO	1	2
SANTA FE SPRINGS	7	12
SANTA MONICA	86	143
SIERRA MADRE	20	33
SIGNAL HILL	19	32
SOUTH EL MONTE	52	87
SOUTH GATE	198	330
SOUTH PASADENA	30	50
SANTA CLARITA-N		152
TEMPLE CITY	39	65
TORRANCE	94	157
VERNON - R	23	0
WALNUT	6	10
WEST COVINA	26	43
WEST HOLLYWOOD	10	17
WESTLAKE VILLAGE	1	2
WHITTIER	118	197
UNINCORPORATED	795	1,173
TOTAL IN COUNTY	18,935	29,598

TABLE 37A		
ADVISORY RHNA DEMOLITION ADJUSTMENT		
ORANGE COUNTY		
1984-86		
JURISDICTION	ACTUAL DEMOLITIONS	DEMOLITION ADJUSTMENT
ANAHEIM	275	458
BREA	67	112
BUENA PARK	47	78
COSTA MESA	45	75
CYPRESS	12	20
FOUNTAIN VALLEY	3	5
FULLERTON	44	73
GARDEN GROVE	160	267
HUNTINGTON BEACH	83	138
IRVINE	1	2
LA HABRA	42	70
LA P, MA	0	0
LAGUNA BEACH	33	55
LOS ALAMITOS	48	80
NEWPORT BEACH	219	365
ORANGE	93	155
PLACENTIA	11	18
SAN CLEMENTE	21	35
MISSION VIEJO-N		14
SAN JUAN CAP	2	3
SANTA ANA	585	975
SEAL BEACH	38	63
STANTON	24	40
TUSTIN	40	67
VILLA PARK	1	2
WESTMINSTER	49	82
YORBA LINDA	23	38
UNINCORP. -R	141	82
DANA POINT-N		9
COUNTY TOTAL	2,107	3,382

TABLE 38A  
 ADVISORY RHNA DEMOLITION ADJUSTMENT  
 RIVERSIDE COUNTY  
 1984-86

JURISDICTION	ACTUAL DEMOLITIONS	DEMOLITION ADJUSTMENT
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BANNING	21	35
BEAUMONT	9	15
BLYTHE	48	80
CATHEDRAL CITY	0	0
COACHELLA	7	12
CORONA	46	77
DESERT HOT SPGS	4	7
HEMET	20	33
INDIAN WELLS	1	2
INDIO	12	20
LA QUINTA	0	0
LAKE ELSINORE	7	12
MORENO VALLEY	9	15
NORCO	0	0
PALM DESERT	11	18
PALM SPRINGS	4	7
PERRIS	19	32
RANCHO MIRAGE	24	40
RIVERSIDE	204	340
SAN JACINTO	14	23
UNINCORPORATED	150	250
 TOTAL COUNTY	 610	 1,017

TABLE 39A  
 ADVISORY RHNA DEMOLITION ADJUSTMENT  
 SAN BERNARDINO COUNTY  
 1984-86

JURISDICTION	ACTUAL DEMOLITIONS	DEMOLITION ADJUSTMENT
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ADELANTO	1	2
BARSTOW	5	8
BIG BEAR LAKE	27	45
CHINO	67	112
COLTON	18	30
FONTANA	59	98
GRAND TERRACE	0	0
LOMA LINDA	1	2
MONTCLAIR	4	7
NEEDLES	5	8
ONTARIO	58	97
RANCHO CUCAMONGA	9	15
REDLANDS	38	63
RIALTO	20	33
SAN BERNARDINO	236	393
UPLAND	12	20
VICTORVILLE	15	25
HESPERIA - N	0	0
HIGHLAND - N	0	0
TWENTY NINE P.-N	0	0
UNINCORPORATED	0	0
TOTAL IN COUNTY	575	958



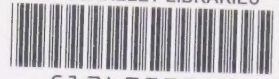
TABLE 40A		
ADVISORY RHNA DEMOLITION ADJUSTMENT		
VENTURA COUNTY		
1984-86		
JURISDICTION	ACTUAL DEMOLITIONS	DEMOLITION ADJUSTMENT
CAMARILLO	19	32
FILLMORE	15	25
MOORPARK	3	5
OJAI	5	8
OXNARD	29	48
PORT HUENEME	3	5
SAN BUENAVENTURA	26	43
SANTA PAULA	22	37
SIMI VALLEY	23	38
THOUSAND OAKS	25	42
UNINCORPORATED	53	88
COUNTY TOTAL	223	372

TABLE 41A  
ADVISORY RHNA DEMOLITION ADJUSTMENT  
IMPERIAL COUNTY

JURISDICTION	DEMOLITION ADJUSTMENT
BRAWLEY	14
CALEXICO	12
CALIPATRIA	2
EL CENTRO	24
HOLTVILLE	4
IMPERIAL	3
WESTMORELAND	1
UNINCORPORATED	24
TOTAL IN COUNTY	83

TABLE 42A		
ADVISORY RHNA DEMOLITION ADJUSTMENT		
COUNTY SUMMARY		
1984-86		
COUNTY	ACTUAL DEMOLITIONS	DEMOLITION ADJUSTMENT
LOS ANGELES	18,935	29,598
ORANGE	2,107	3,382
RIVERSIDE	610	1,017
SAN BERNARDINO	575	958
VENTURA	223	372
IMPERIAL		83
REGION	22,450	35,410



**STAFF**

**MARK A. PISANO**, Executive Director  
**LOUIS F. MORET**, Chief Operating Officer  
**ARNOLD I. SHERWOOD**, Director, Community and Economic Development  
**ANNE BAKER**, Director, Environmental Planning  
**JIM GOSNELL**, Director, Transportation Planning  
**FRANK HOTCHKISS**, Director, Regional Strategic Planning  
**GILBERT SMITH**, Director, Government and Public Affairs

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**GORDON PALMER**, Principal Economist, Economic Analysis and Development  
**JOHN OSHIMO**, Senior Planner  
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**SUSANNA BERZSENYI**, Associate Graphic Designer  
**KAY MURAKAMI**, Administrative Secretary  
**BETTY MANN**, Administrative Secretary

**Consultants**

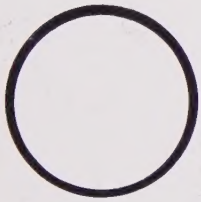
**SYLVIA RUIZ**, Tierra Concepts  
**COLIN LENNARD**, SCAG Counsel

\* project staff

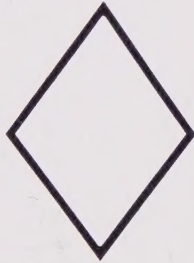


# REVISED REGIONAL HOUSING NEEDS ASSESSMENT

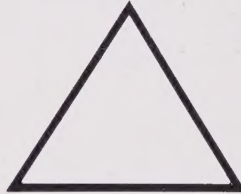
DECEMBER 1988



Regional Mobility Plan



Air Quality Management Plan  
*Appendix IV-G*



Regional Growth  
Management Plan

An identification of existing and future housing needs from 1989 to 1994, pursuant to State Housing Law.